

From: info@waipadc.govt.nz
To: [Policy Shared](#)
Subject: External Sender: Waipā District Plan - Plan Change Submission Form 5 - Simone Williams
Date: Monday, 27 April 2026 9:37:17 pm

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

Proposed Private Plan Change 37

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):

The submission relates to the proposed rezoning of rural zoned land to Medium Density Residential, including the structure plan, zoning maps, and associated provisions enabling urban development of this land. In particular, this submission relates to the extent of the rezoning, the urban-rural interface, and the provisions (or lack of provisions) relating to landscape buffers, setbacks, and integration with adjoining open space and rural land.

My submission is

- The proposed development appears to be out of sequence with planned growth, particularly in relation to the rezoning of the rural zoned land. I understand that approximately half of the site is already identified as deferred residential, however the remaining portion is currently zoned rural. Future growth areas identified in the Waipā District Plan appear to have been strategically staged to ensure essential infrastructure such as schools, commercial centres, roads and community facilities are delivered alongside population growth. I am concerned that bringing forward the rural zoned land for development undermines this sequencing, and that Leamington and Cambridge are not currently

equipped to support development of this scale, which may place pressure on existing infrastructure and services.

- The potential loss of highly productive land associated with the rezoning of the rural zoned land is a concern. Based on publicly available mapping from Manaaki Whenua Landcare Research's Land Resource Information System (LRIS), including the New Zealand Land Resource Inventory (NZLRI) Land Use Capability dataset, it appears that much of this land is classified as Land Use Capability Class 2, with smaller areas of Class 3 near the river. My understanding is that land within LUC Classes 1–3 is considered highly productive under national policy.
- My understanding of the National Policy Statement for Highly Productive Land is that it focuses on the ability of land to support primary production over the long term. In this case, I am concerned that the rural land being rezoned appears to have the characteristics of productive land, and that rezoning it would permanently remove its ability to be used for primary production.
- While I acknowledge that site-specific assessment has been undertaken, I am not convinced that this fully reflects the broader role of this land within the surrounding rural environment. The land appears to form part of a wider area of productive rural land surrounding Cambridge, and its rezoning would contribute to a reduction in the availability of that resource.
- I am also concerned that the way fragmentation has been described in the application may understate the productive potential of the rural land. In my view, the fact that the rural land may become more separated from other areas does not necessarily mean it is no longer capable of supporting productive uses. It seems that a range of land-based primary production activities could still be undertaken on this land, and I am not convinced that this has been fully recognised.
- I am also concerned that the rezoning of the rural zoned land may have indirect effects on the productive use of adjoining rural land. In particular, the introduction of urban activities at the rural interface has the potential to create constraints on established primary production activities, reduce operational flexibility, and contribute to the fragmentation of the wider rural land resource.
- I am not clear that the proposal has demonstrated that the loss of this land is necessary. In particular, I am uncertain whether it has been clearly established that:
 - sufficient development capacity cannot be achieved elsewhere;
 - there are no reasonably practicable alternative locations; and
 - the loss of productive capacity is justified in the long term.
- I note that some of the assessment appears to rely on the proportion of highly productive land being small at a district scale. I am concerned that this may not fully reflect the long-term and cumulative effects of losing this type of land.
- Overall, I am concerned that rezoning this land would remove its ability to support land-based primary production on a permanent basis, and may also compromise the ongoing productive availability of adjoining rural land, without clear justification that this outcome is necessary or consistent with the intent of national policy.
- I am also concerned about the impact on the reserve and surrounding open space areas. Based on my experience of the area, there is currently a clear sense of openness and a transition between the urban area and the surrounding rural environment. This contributes to the amenity experienced by

users of the town belt walk, including a sense of space, outlook, and connection to a more rural landscape.

- I am concerned that the introduction of medium density residential development in this location would significantly alter this experience, resulting in a more continuous and visually dominant built form and reducing the sense of openness that currently exists, which is not anticipated in a rural zoned environment.

To assist in understanding how the proposed development may affect this experience, I have included an attachment generated using simple AI-based image prompts using a photo I took myself. This visualisation is indicative only and has not been prepared or tested against the proposed rule framework, including any setbacks, planting, or other controls. However, it provides a general representation of how medium density residential development could appear along this edge. In my view, it helps illustrate the potential for a more continuous and visually dominant built form, and supports my concern that the current sense of openness and rural transition experienced from the reserve and town belt walk may be significantly reduced.

- I note that the landscape assessment discusses mitigation measures such as planting and edge treatment. However, it is not clear to me how these measures will be secured through the District Plan provisions. In particular, I have not been able to identify any specific controls relating to setbacks, buffer widths, or planting requirements along the edge adjoining the reserve and open space areas.
- Without clear and enforceable rules, I am concerned that the proposed landscape mitigation may not be implemented in a way that adequately maintains the existing amenity values of the area.
- In my view, establishing well-functioning communities requires residential development to be supported by an adequate supply of commercially zoned land. It is unclear whether this has been sufficiently addressed. Carter's Flat appears to be the only new commercial area identified in Cambridge, however given its historical use as an industrial area, I am concerned there may be delays in transitioning this land to commercial use.
- I understand that the National Policy Statement on Urban Development seeks to achieve well-functioning urban environments. In my opinion, this requires residential growth to be supported by sufficient business land and services. I am not convinced that this proposal demonstrates how that outcome will be achieved, particularly given the reliance on a single future commercial area.
- There appear to be conflicting statements in the application and supporting reports regarding the number of dwellings anticipated. I understand that approximately 1,250 dwellings are proposed. However, under the Medium Density Residential Standards, it seems possible that a significantly greater number of dwellings could be enabled as permitted activities, with further intensification through consent processes. This creates uncertainty as to the true scale of development.
- It is unclear to me what mechanisms would limit development to the stated yield of 1,250 dwellings. I am concerned that this figure may not represent a maximum cap, and that the actual scale of development and its associated effects could be considerably greater.
- The Integrated Transport Assessment does not appear to clearly address the full development potential enabled by Medium Density Residential zoning. I question whether the transport network has

been appropriately modelled to reflect the likely intensity of development, and consider that this is an important matter that should be clarified.

- Traffic congestion is already a concern in this area and I am concerned that this proposal will worsen existing issues. In particular, I am unsure what measures are proposed to ensure that children and families can safely cross Shakespeare Street when travelling to schools or the town centre.
- In my experience, turning right into Shakespeare Street from Addison Street is already difficult and at times unsafe. I am concerned that increasing traffic volumes will further compromise safety, and I am not convinced that the proposed mitigation measures will adequately address this.
- I am also concerned that the introduction of traffic signals at the Wordsworth Street and Shakespeare Street intersection may increase congestion rather than improve it, although this is not clearly explained in the application
- I am concerned about the lack of clarity regarding future transport connections, particularly in relation to Addison Street. While I do not support the establishment of a connector road in this location, I am concerned that the current proposal does not provide sufficient certainty that such a connection will not occur in the future. This creates uncertainty and raises concerns about potential increases in traffic volumes and changes to the character of the street over time. In my view, this matter should be clearly addressed through the District Plan provisions to avoid such connection.
- I am concerned that bringing this development forward may place additional pressure on existing infrastructure and services, including roads, water supply, wastewater, and community facilities. Given that this area does not appear to have been planned for development until a later stage, I am not confident that the necessary infrastructure will be in place to support this level of growth.
- I am also concerned about the potential cost implications for the community. If additional infrastructure upgrades are required to service this development, it is unclear how these costs will be funded and whether they may ultimately be borne by existing ratepayers.

I seek the following decision/s from Council

For these reasons, I oppose the proposed plan change, particularly as it relates to the rezoning of the rural zoned land, as it does not appear to clearly demonstrate consistency with the National Policy Statement for Highly Productive Land, is not clearly aligned with identified growth strategies, and may result in development being directed away from already zoned land, rather than addressing a clearly demonstrated need for additional capacity.

Attachments

Please upload any file attachments here



