

From: info@waipadc.govt.nz
To: [Policy Shared](#)
Subject: External Sender: Waipā District Plan - Plan Change Submission Form 5 - Philip McHugh
Date: Monday, 27 April 2026 11:15:45 am

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Full name of submitter Philip McHugh

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 not

If others make a similar submission, will you consider presenting a joint case with them at the hearing? No

Do you support the proposed change(s)? I support in part

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

Please see attached.

My submission is

Please see attached.

I seek the following decision/s from Council

Please see attached.

Attachments

[PM Submissions.pdf](#) (142 kb)

Submission on Proposed Plan Change – Rider Park

Submitter: Philip McHugh

Position: Oppose in part

1. I am not opposed to the proposed plan change in principle. I support the need for urban growth in Cambridge and Leamington. Growth is both necessary and expected.
2. However, I oppose the plan change in its current form on the basis that it does not adequately assess or address the consequences for the wider transport network and the Cambridge and Leamington town centres.
3. The proposal enables a development of at least 1,250 dwellings. That materially exceeds the approximately 732 dwellings anticipated for the C5 growth cell. The transport effects of that increase, expected to generate approximately 6,680 vehicle movements per day, will not be confined to the immediate roads and intersections adjoining the site.

Traffic Flow

4. The key constraint is that traffic from Rider Park will flow through Shakespeare Street to Cambridge via Cook St and the Victoria Bridge or via Fergusson Bridge and Achilles Ave. Access to State Highway 1 relies on the same constrained routes, as there is no northbound on-ramp south of Cambridge. In practical terms, the proposal will add significant vehicle movements into a network that already depends on heavily constrained bridge access, limited SH1 access and town centre roads that are routinely congested. Those are known constraints.
5. The assessment provided does not adequately engage with that reality. It focuses on local access, local intersections, internal connectivity, and site access where local means Rider Park. While those matters are addressed in some detail, the broader question is whether the wider Cambridge and Leamington transport network can accommodate the cumulative effects of this growth. On the material provided, that question is not answered.
6. In particular, there is no meaningful assessment of the additional demand placed on the river crossings, the Cambridge town centre network, or access to State Highway 1. Those are the points at which congestion is already experienced. They are also the points through which this development must inevitably connect.

7. The section 32 evaluation does not resolve that issue. It relies on the transport assessment, but does not independently evaluate the wider effects of increased traffic, including congestion, travel time delays, and reduced network performance. Nor does it grapple with the risk of enabling development ahead of the infrastructure required to support it.
8. There is also a clear inconsistency in approach. Water infrastructure is addressed with a degree of rigour, including capacity and staging considerations. By contrast, there is no equivalent framework for the transport network beyond the immediate site. There is no mechanism that ties development to the capacity or performance of the wider network.

Town Centres

9. The same issues arise in relation to the Cambridge and Leamington town centres. The proposal assumes ongoing reliance on these centres for employment, retail, and services. That assumption is realistic, but it is not tested. Those centres are already under pressure in terms of traffic flow and parking. Cambridge town centre sits within a constrained roading grid immediately north of the river crossings. The public parking map for Cambridge shows a limited and tightly managed parking environment.
10. For instance, there is no assessment of whether existing public parking supply, understood to be approximately 3,000 spaces, has the capacity to accommodate the additional demand generated by approximately 1,250 dwellings. Moreover, 3,000 reflects total supply, not available capacity. In the absence of any analysis of peak utilisation, turnover, or circulation effects, it simply cannot be concluded that the town centre can absorb that demand. If capacity is constrained, the effect is not simply inconvenience. It manifests as increased circulation within an already constrained network immediately north of river crossings, thereby compounding existing congestion issues.
11. The proposed neighbourhood centres do not address that issue. They are clearly framed as convenience-based centres intended to meet day-to-day local needs. They are not a substitute for the Cambridge or Leamington town centres and are unlikely to materially reduce reliance on those centres, particularly Cambridge, for broader employment, retail, hospitality, professional services, medical services or other wider commercial needs. The effect is that demand will continue to be directed into already constrained areas.
12. The Urban Design Report and Climate Change Assessment both rely, to some extent, on walkability, local services, public transport and reduced car dependency.

Those are desirable outcomes, but remain aspirational on the material provided. The material does not demonstrate that they will be achieved at a scale sufficient to avoid additional pressure on the wider roading network and town centres. In particular, current public transport provision is limited, and there is no clear basis to conclude that private vehicle use will materially reduce in the short to medium term.

13. The material provided does not assess whether Cambridge and Leamington town centres have the capacity to absorb the additional demand generated by this development. That includes traffic movements, parking demand, and general network pressure within the town centre environments, which are already constrained.

Overall

14. Overall, the proposal manages effects within the site and at its edges, but does not adequately assess the receiving environment into which those effects will flow. In particular, it does not answer whether the wider transport network and town centres can absorb the cumulative impact of this level of development. In effect, the proposal is assuming that the existing network and centres will absorb the additional demand, without demonstrating that they can.
15. The appendices reinforce rather than resolve these concerns. The Structure Plan confirms the increased scale of development. The Rule Framework confirms the limited function of neighbourhood centres. The Climate Change Assessment accepts that current public transport provision is limited and that reductions in car dependency are constrained in the near term. None of that is matched by a corresponding assessment of network capacity.
16. I therefore seek that the plan change be declined unless and until Council is satisfied that the wider Cambridge and Leamington transport network can accommodate the cumulative effects of the development. That analysis should address river crossing capacity, Cambridge town centre traffic flow, access to State Highway 1, and the ability of the Cambridge and Leamington town centres to absorb additional parking, retail and service demand.
17. In the alternative, the plan change should be deferred or subject to staging controls linked to wider transport network performance, not just local intersection upgrades and water infrastructure. Any approval should require an updated section 32 evaluation that properly assesses the transport-related costs and risks of proceeding before wider infrastructure constraints are resolved.

18. Growth should occur. But it should occur in step with the infrastructure required to support it. On the material provided, that link has not been demonstrated.