



Waipā District Plan Plan Change Submission Form

Form 5

Clause 6 of the First Schedule to the Resource Management Act 1991

Send to: Waipā District Council, Private Bag 2402, Te Awamutu 3840

Phone: 0800 924 723 | Online: www.waipadc.govt.nz/planchanges | Email: districtplan@waipadc.govt.nz

Please attach additional sheets if there is not enough space for your submissions. If you do not wish to use this form, please ensure that the same information required by this form is covered in your submission.

COUNCIL USE ONLY

Date received

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Note: You must fill in **ALL** sections of this form.

Submissions close **5pm Tuesday, April 28, 2026.**

1. Submitter details

Full name of submitter:	Waipā District Council
Contact name if different from above:	Michael Briggs
Contact phone number(s)	
Email address:	
Address for service: (required if no email address is provided)	Email address

We will serve all formal documents electronically via the email address provided above. Where there is no email address provided the documents will be posted to the above address.

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

Proposed Private Plan Change 37 – Rider Park Structure Plan Area

3. Trade competition

Select one	☐ I could	gain an advantage in trade competition through this submission.
	☒ I could not	
Select one	☒ I am	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	

4. Attendance at Council hearing

Select one	☒ I do	wish to be heard (attend and speak at the Council hearing) in support of my submission
	☐ I do not	
If others make a similar submission, I will consider presenting a joint case with them at the hearing.		☐ Yes ☐ No

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

Select one	☐	I SUPPORT	Refer to the attached submission
	☐	I SUPPORT IN PART	
	☐	I OPPOSE	

6. My submission is: (please include the reasons for your view)

Refer to the attached submission

7. I seek the following decision/s from Council: (give precise details – e.g. what you would like the wording of a specific provision (or map) to be changed to)

Refer to the attached submission

8. Signature of submitter (note: a signature is not required if you make your submission by electronic means, however please type your name below)

Signature of submitter:
(or person authorised to
sign on behalf of submitter)



Wendy Robinson
Manager District Plan & Growth

Dated 28 April 2026

Note to person making submission

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the consent authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious;
- It discloses no reasonable or relevant case;
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- It contains offensive language;
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Personal Information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991. The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you.

Your submission, including your name and contact details, will be made available for inspection at all Council service centres and libraries in accordance with the requirements of the Act. It may also be made available on the Council's website. A document summarising all submissions, including names and contact details of submitters will be posted on the Council's website

If you believe there are compelling reasons why your contact details should be kept confidential please contact the processing planner for this application.

28 April 2026

To: Waipā District Council
Private Bag 2402
Te Awamutu, 3840



RE: Submission on Plan Change 37: Rider Park Structure Plan

Submitter:	Waipā District Council (Waipā DC)
Contact Phone Number:	[REDACTED]
Email Address:	[REDACTED]
Address for Service:	Email address
Trade Competition:	I could not gain an advantage in trade competition through this submission
Hearing:	Waipā DC wishes to be heard in support of this submission.
Others:	If others make a similar submission, Waipā DC would not consider presenting a joint case with them at the hearing.
Position:	Neutral

1 SPECIFIC PROVISIONS

The specific provisions of Plan Change 37 (PC37) to which this submission relates are:

The economics of growth

1. To assess the appropriateness of advancing the out of sequence C5 Growth Cell and unanticipated additional land, there needs to be sufficient assessment of the effects on the pre-2035 growth cells, housing affordability and the ability to ensure cost neutrality to Council without undermining Council's existing infrastructure investment in planned growth areas. Comments have been made in relation to the Economics Assessment.

Transportation

2. Understanding the implications for the strategic transport network to ensure there isn't any inappropriate reliance on unfunded or uncertain future strategic upgrades. Focussing on the cumulative and compounding traffic effects, internal transport network, alignment with the planned staged development, timing of traffic infrastructure upgrades, and the safe and convenient travel for non-car modes.

Three Waters

3. It is expected that three waters infrastructure needs to be delivered before, or at least concurrently with, the stages of development that creates demand for it.
4. The location of the indicative internal water, stormwater and wastewater networks, and consideration of their appropriateness, efficiency and timing of required upgrades.

5. Water supply insofar they relate an additional Pressure Reducing Valve (PRV) and early consideration of water sensitive design.
6. Stormwater insofar they relate to re-vegetating the gully (Catchments 1 – 4), on-lot and off-lot soakage, one year baseline groundwater monitoring, existing overland flow paths, management devices sizing and natural hydrology.
7. Wastewater insofar they relate to further modelling and detailed design, and the expectation that the developer will be responsible for funding the upgrades.

Ecological Impact Assessment

8. Insofar as they relate to long-tailed bats with the Light Management Area and the compensation calculation.

Reserves

9. Consideration of the number, size and location of all proposed reserves within the site.
10. The responsibilities, costs and obligations for Council in relation to accepting the proposed Indicative Local Purpose Reserves.

Structure Plan

11. The image insofar they relate to staging, internal road and pedestrian/cycle networks, stormwater management, reserve areas, the pā site and Light Management Area.
12. The text insofar they relate to the background, overview, key design principles, reserves, the pā site, landscape principles, planting fast-growing exotics, open space network, indicative pedestrian and/or cycling links, 'Green Streets', Private Development Agreement, three water solutions and long-tailed bats.

Proposed Modified Rule Framework

13. Insofar they relate to tree removal / pruning activities, neighbourhood centres (Rule 2A.4.2.69), post construction lighting (Rule 2A.4.2.70), average dwelling density (Rule 15.4.2.1B) and subdivision parameters (Rules 15.4.2.91A and B).

2 REASONS FOR SUBMISSION AND RELIEF SOUGHT

The reasons for and relief sought by this submission are set out in (2.1) – (2.8) below:

2.1 The economics of growth

1. The Economic Assessment identifies that Cambridge would have a shortfall in residential capacity over the medium (2022-2032) and long (2022-2052) terms which could be satisfied with some of the post-2035 growth cells being brought forward. Although the assessment highlights that the potential benefits of doing so need to be balanced with the impacts on existing zoned/growth areas, as well as the costs associated with upgrading existing or constructing new infrastructure to accommodate growth, it does not adequately consider

the effects of out of sequence and unanticipated growth including on Council's infrastructure investment in pre-2035 growth areas.

Relief Sought

Further details and consideration (and/or a peer review of the Economic Assessment), including, but not limited to, the appropriateness of advancing the C5 Growth Cell before other growth cells, the effects on the pre-2035 growth cells, including Council's infrastructure investment in those locations and subsequent change to Development Contribution collection rates, from advancing the Structure Plan area, the risk of inadequate infrastructure capacity and the likelihood of reducing the committed infrastructure investment.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2. While the Economic Assessment identifies that the Structure Plan has the potential to lower residential land prices / increase housing affordability, the assessment relies on increasing the supply of residential capacity, neither the Economic Assessment or Structure Plan identify specific measures or outcomes sought in relation to provide affordable housing.

Relief Sought

That affordable housing measures beyond increasing residential capacity are considered and that the Structure Plan is amended to identify and ensure housing affordability outcomes.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

3. The Economic Assessment relies on the development being cost-neutral to Council (based on the developer bearing direct infrastructure costs pre-2035) and any such costs will be formalised by way of an Infrastructure Works Agreement. Accordingly, the details and agreement of infrastructure costs must be confirmed prior to the subdivision stage.

Relief Sought

Confirmation of the expected infrastructure costs pre and post 2035, and that the Structure Plan Text is amended to identify that an Infrastructure Works Agreement or Private Developer Agreement ensuring cost neutrality to Council is required prior to the subdivision stage.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2.2 Transportation

1. Although Appendix 1 of the Integrated Traffic Assessment identifies the 2022-2052 Waipa Transport Strategy as a relevant transportation strategy, there is no assessment of the proposal against the relevant objectives of the strategy.

Relief Sought

Consideration as to whether the Structure Plan would achieve and ensure consistency with the objectives of the 2022-2052 Waipa Transport Strategy

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2. Given the existing transportation issues on the Leamington side of the Waikato River and that the Structure Plan would add a large number of new dwellings, the Integrated Traffic Assessment should include assessments of the cumulative and compounding traffic effects (including but not limited to cross-river capacity and the wider network).

Relief Sought

That the Integrated Traffic Assessment is updated to include assessments of the Structure Plan's cumulative and compounding traffic effects.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

3. As the Structure Plan does not identify any indicative stage boundaries or internal roading networks, Council is unable to determine whether the proposed traffic infrastructure upgrades (including key intersections and corridors) are appropriate, efficient and timely.

Relief Sought

That the Integrated Traffic Assessment is updated to include the indicative stage boundaries or internal roading networks, and the appropriateness, efficiency and timing of the traffic infrastructure solutions are considered. Infrastructure must be delivered prior to or concurrently with the stages of development that generate the demand for it.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

4. With no indicative internal pedestrian / cycle networks identified, the Structure Plan does not demonstrate safe and convenient travel for non-car modes.

Relief Sought

Consideration of walking and cycling connections to Leamington Primary School, Cambridge Middle School and Cambridge High School, Shakespeare Street Commercial Zone and bus stop, and the Te Awa River Ride.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2.3 Three Waters

1. As the Structure Plan does not identify any indicative stage boundaries or internal water, stormwater or wastewater networks, Council is unable to determine whether the proposed three waters infrastructure upgrades are appropriate, efficient and timely.

Relief Sought

That the Water & Wastewater Assessment and Stormwater Management Plan are updated to include the indicative stage boundaries or internal water, stormwater or wastewater networks, and the appropriateness, efficiency and timing of the three waters infrastructure solutions are considered. Infrastructure must be delivered prior to or concurrently with the stages of development that generate the demand for it.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

Water Supply

2. The water supply modelling demonstrates that Stage 1 (eastern end of Wordsworth Street) would not cause significant issues to the existing reticulated supply, but an additional Pressure Reducing Valve (PRV) may need to be installed if a connection loop back to the bulk main (asset Id: 3343218) were to occur. The timing, staging and requirements relating to PRV would need to be confirmed at the subdivision stage. Further modelling will be required to confirm the need for network upgrades, particularly if a looped connection to the bulk main is pursued.

Relief Sought

That the Structure Plan is amended to identify the timing, staging and requirements of an PRV must be confirmed at the subdivision stage and that further modelling will be required to confirm the need for network upgrades.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

3. Early consideration of water sensitive design, including rainwater harvesting and greywater reuse, is recommended to manage long term demand and support climate change mitigation.

Relief Sought

That the Structure Plan is amended to include a rule(s) requiring water sensitive design assessment at the subdivision stage to manage long term demand and support climate change mitigation.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

Stormwater

4. The gully that Catchments 1 - 4 are proposed to discharge to will need extensive planting and have appropriate design outlets that ensure no scour and erosion occurs downstream. The robust planting and maintenance will need to be confirmed and well implemented to ensure effectiveness. Developers must be responsible for ensuring establishment is completed prior to vesting the reserve to Council with appropriate maintenance obligations/duration extensions as and when respective catchments and their respective outlets come online.

Relief Sought

The Structure Plan is amended to confirm the implementation and maintenance of planting in the gully, the design requirements of the stormwater outlets, and that developers will be responsible for ensuring establishment is completed prior to vesting to Council.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

5. For Catchments 1 – 4, on-lot soakage is supported as a primary stormwater management approach (subject to confirmation by site-specific testing at subdivision stage).

Relief Sought

That the Structure Plan confirms that Catchments 1 – 4 are suitable for on-lot soakage is appropriate and the actual design will need to be confirmed by site-specific testing at subdivision stage.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

6. As Catchment 6 and potentially parts of Catchment 5 are underlain by Taupo Pumice Alluvium, no direct on-lot soakage or discharge of stormwater should be permitted, and alternative stormwater solutions (e.g. lined rain gardens, detention/reuse tanks) will be required.

Relief Sought

Confirmation as to whether parts of Catchment 5 are not suitable for direct on-lot soakage or discharge of stormwater.

The Structure Plan be amended to identify that direct on-lot soakage or discharge of stormwater is not permitted Catchment 6 (and parts of Catchment 5 if required) and alternative stormwater solutions (e.g. lined rain gardens, detention/reuse tanks) will be required.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

7. As indicated by the slope stability analysis, on-lot soakage or discharge of stormwater should not be permitted within 20m of the riverbank, 5m from gully crest or in areas underlain by Taupo Pumice Alluvium.

Relief Sought

The Structure Plan be amended to identify that on-lot soakage or discharge of stormwater is not permitted within 20m of the riverbank, 5m from gully crest or in areas underlain by Taupo Pumice Alluvium.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

8. While perched groundwater is generally greater than 5m below ground level, Council expects a minimum of one year of baseline groundwater monitoring prior to detailed design and that soakage systems are not located in areas with high groundwater or Taupo Pumice Alluvium soils.

Relief Sought

That the Structure Plan is amended to require a minimum of one year of baseline groundwater monitoring prior to detailed design and that soakage systems are not located in areas with high groundwater or Taupo Pumice Alluvium soils.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

9. All existing overland flow paths must be maintained and not obstructed by development. Detailed bespoke design for appropriate crossing points under road networks would be required at the subdivision stage to fully understand whether box or piped culverts are appropriate.

Relief Sought

The Structure Plan be amended to identify that overland flow paths must be maintained and not obstructed, and that crossing points under road networks will require detailed bespoke design at the subdivision stage.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

10. To support climate resilience, as indicated in the Stormwater Management Plan and Climate Change Assessment, all stormwater management devices must be sized using RCP8.5 rainfall projections for 2090 and the need for on-site water sensitivity solutions (reuse - rainwater tanks, greywater systems) should be confirmed at the subdivision stage.

Relief Sought

That the Structure Plan is amended to identify all stormwater management devices must be sized using RCP8.5 rainfall projections for 2090 and the need for on-site water sensitivity solutions should be confirmed at the subdivision stage.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

11. The Structure Plan must ensure that the natural hydrology is maintained, sensitive receiving environments are protected, and all stormwater management is robustly designed for climate change, geotechnical, and groundwater constraints.

Relief Sought

That the Structure Plan be amended so it identifies that the natural hydrology must be maintained, sensitive receiving environments must be protected, and all stormwater management must be designed for climate change, geotechnical, and groundwater constraints

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

Wastewater

12. The Water and Wastewater Assessment identifies that wastewater will be conveyed via gravity pipes to a pump station(s), which will then discharge to the existing Leamington gravity network and ultimately to the Cambridge Wastewater Treatment Plant. Discharging 6 – 12 l/s of peak wet weather flow would require targeted upgrades to approximately 520m of pipe along Wordsworth Street and 250m along Burns Street, increasing diameters from 225mm to 300mm. These upgrades would be necessary to avoid surcharging and maintain a minimum 20% reserve capacity in the network.

Relief Sought

The Structure Plan should identify that further wastewater modelling and detailed design is required at the subdivision stage to confirm staging, connection points, and any additional requirements that align with water sensitive design.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

13. The timing of the wastewater upgrades will depend on the pace of development and actual flows generated. Given the unanticipated nature of development and burden of asset upgrades occurring earlier than planned, it is expected that the developer will be responsible for funding these works, consistent with Council policy for unanticipated or accelerated growth related infrastructure. The expectation that the developer will be responsible for funding the upgrades.

Relief Sought

That the Structure Plan identifies that, in accordance with Council's policy for unanticipated or accelerated growth related infrastructure, all wastewater upgrades are to be funded by the developer(s).

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2.4 Ecological Impact Assessment

1. While the Ecological Impact Assessment recommends the 20m wide Light Management Area around the edge of the site, there is no assessment of the appropriateness or effectiveness of the area. Additionally, the assessment also recommends \$200,000 of compensation to Council or a local community trust for predator control in the wider landscape but does not identify how the figure was calculated or demonstrate its appropriateness.

Relief Sought

That a peer review of the Ecological Impact Assessment is undertaken to confirm the appropriateness and effectiveness of the assessment and recommendations, and that the calculation and justification of the proposed compensation is provided.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2.5 Reserves

1. While the Structure Plan Image shows several Indicative Local Purpose Reserves and the AEE identifies that *"Pivotal to the establishment of local identity, community cohesion and connectivity is the establishment of open spaces"* and subsequent resource consent applications may also include additional reserves to supplement the open space network, it is important that sufficient recreation reserves to serve the future population of at least 1,250 dwellings are identified at this stage.

Relief Sought

Consideration as to whether the number, size and location of reserves proposed are sufficient.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2. There is insufficient certainty as to the responsibilities, costs and obligations for Council in relation to accepting the proposed Indicative Local Purpose Reserves, particularly the

central gully space which is proposed to be restored and would require ongoing maintenance by Council.

Relief Sought

Confirmation of the responsibilities, costs and obligations for Council in relation to accepting the proposed Indicative Local Purpose Reserves.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2.6 Structure Plan Image

1. While the Assessment of Environmental Effects (AEE) identifies that development would be staged, the image does not identify any stage boundaries. Additionally, the image does not identify indicative internal roading or pedestrian / cycle networks. Understanding the intended sequencing of development and network layouts at this stage would enable a better understanding of potential impacts / appropriateness of the proposal.

Relief Sought

That the Structure Plan Image is updated to identify proposed stages and indicative internal roading and pedestrian / cycle networks.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2. While the AEE identifies that stormwater would be managed within the site using soakage devices, swales, and attenuation basins, the Structure Plan Image does not confirm the indicative locations of such infrastructure.

Relief Sought

That the Structure Plan Image is amended to confirm the indicative location of all proposed stormwater infrastructure.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

3. That the Structure Plan Image should identify the purpose and indicative location of all proposed reserves within the site.

Relief Sought

That the Structure Plan Image is amended to confirm the purpose and indicative location of all proposed reserves.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

4. The proposed Indicative Local Purpose Reserve along the Waikato River covers the area of existing vegetation and steep river bank. Accordingly, the proposed reserve area would not enable public access along the river and be inconsistent District Plan objectives 15.3.12 and 15.3.13.

Relief Sought

The proposed Indicative Local Purpose Reserve along the Waikato River should be extended to the 20m Geotechnical Setback to enable public access along the river.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

5. Cultural Impact Assessment and Archaeological Report both recommend that the area near to the identified pā site be protected to avoid destruction of borrow pits and associated features in this location. The Structure Plan Image does not provide any indication that protection will be supported.

Relief Sought

That the Structure Plan Image is amended to identify the location of the pā site and associated features.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

6. It is not clear what the narrow strip of Indicative Local Purpose Reserve along the western boundary of the site is intending to achieve and the area should be widened to soften the interface with the Addison Kingsley Reserve.

Relief Sought

Confirmation of the purpose along with widening of the Indicative Local Purpose Reserve along the western boundary of the site.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

7. The proposed use within the Light Management Area (LMA) that extends into the site adjacent to the Pā is not clear. The Structure Plan Image shows Medium Density Residential Zone (MDRZ), while Figure 6 of the Ecological Impact Assessment shows the area as Wildlife Habitat Area. Given the LMA is proposed to avoid / minimise potential effects on long-tailed bats, the shape of the extension and zoning both sides MDRZ has the potential to reduce the effectiveness of the area.

Relief Sought

That the area within the LMA that extends into the site adjacent to the Pā is amended to be Indicative Local Purpose Reserve in accordance with the Ecological Impact Assessment.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2.7 Structure Plan Text

1. Paragraphs S27.2.1 – S27.5 and S27.2.7 – S27.2.12 (background of the Waipā District Plan, Waipā 2050 District Growth Strategy, Future Proof and RMA) are not relevant to the future development of the Structure Plan area and should be deleted.

Relief Sought

That paragraphs S27.2.1 – S27.5 and S27.2.7 – S27.2.12 be deleted.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2. Paragraph S27.2.13 is not clear what the best-practice urban design principles are or how they could be applied to future development.

Relief Sought

That paragraph S27.2.13 be amended to identify best-practice urban design principles and how they are to be applied.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

3. Paragraph S27.2.14 (overview of areas) is not relevant to the future development of the Structure Plan area and should be deleted.

Relief Sought

That paragraph S27.2.14 be deleted.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

4. Paragraph S27.2.15 relates to the current zoning and is therefore are not relevant to the future development of the Structure Plan area and should be deleted.

Relief Sought

That paragraph S27.2.15 be deleted.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

5. Paragraph S27.2.18 does not identify how the key design principles will be achieved, particularly:
 - a. The proposed housing typologies.
 - b. The landscaped pedestrian network details.
 - c. Compact and carbon positive development outcomes.
 - d. Integrated water sensitive planning and design principles.

Relief Sought

That paragraph S27.2.15 is amended to identify how the key design principles will be achieved.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

6. While paragraph S27.2.20 identifies the proposed landscape principles, it is not clear whether they are appropriate or can be achieved at the future development stage. The location and connectivity between indicative blue green corridors, open spaces and green streets have not been provided. Additionally, the Structure Plan does not identify which habitats are proposed to be retained, the contents of the detailed vegetation strategy, and the location of the swale and wetland features.

Relief Sought

Consideration as to whether the proposed landscape principles are appropriate and can be achieved at the future development stage.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

7. The references in paragraphs S27.2.20 and S27.2.23 relating to retaining and planting fast-growing exotics are at odds with the Cultural Impact Assessment's preference of using local native vegetation. Additionally, some exotic species can be problematic in terms of seed dispersal resulting in a future weed problem.

Relief Sought

Consideration of the appropriateness of retaining and planting exotic vegetation is required in relation to the Cultural Impact Assessment's native vegetation preference and future Council maintenance.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

8. The open space network paragraphs S27.2.21 to S27.2.26 lack detail to ensure that the outcomes sought would be achieved. Details should be provided in relation to how the Structure Plan interface would achieve a positive relationship with the town belt and what the “communal open spaces framework” is and how it will be achieved.

Relief Sought

Paragraphs S27.2.21 to S27.2.26 are amended to detail how the Structure Plan interface would achieve a positive relationship with the town belt and what the “communal open spaces framework” is and how it will be achieved.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

9. Although paragraph S27.2.22 anticipates that connectivity between and within the reserves will be established through a network of pedestrian and/or cycling links as part of subsequent resource consent applications, as the Structure Plan Image does not identify their location, it is unclear how and whether such connectivity would be achieved via future consent processes.

Relief Sought

That Structure Plan Image is updated to identify all proposed reserves and indicative pedestrian and/or cycling links.

That paragraph S27.2.22 is amended to identify that the final location and design of any reserve and pedestrian and/or cycling connections will be confirmed as part of subsequent resource consent applications.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

10. Paragraph S27.2.24 does not identify that the Indicative Local Purpose Reserve along the northern boundary of the Structure Plan area adjacent to the Waikato River would provide public access.

Relief Sought

That paragraph S27.2.24 is amended to identify that public access provided in the Indicative Local Purpose Reserve along the northern boundary of the Structure Plan area adjacent to the Waikato River.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

11. While paragraph S27.2.26 identifies that *“the Structure Plan also provides opportunity for the establishment of ‘Green Streets’ which will connect into the open space network”* and *“A ‘Green Street’ network could provide for footpath connections between residential*

streets and swale or rain garden designs may be incorporated to complement the overall network”, the proposed design of the ‘Green Streets’ or the location of the internal open space and road networks are not identified.

Relief Sought

That the proposed ‘Green Streets’ design details are provided, and the Structure Plan Image is updated to show the indicative location of the internal open space and road networks.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

12. Although paragraph S27.2.31 identifies that a Private Development Agreement (PDA) would implement a strategic and integrated approach to planning for and managing the extent to which the proposal contributes to transport system, it is unclear what the proposed approach is and therefore whether it is appropriate for it to be left to a PDA.

Relief Sought

Confirmation of the details of the proposed strategic and integrated transportation approach and consideration of whether a PDA is appropriate.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

13. Paragraph S27.2.32 outlines the proposed key principles for stormwater management, but details and location of the indicative management features have not been identified.

Relief Sought

Confirmation of the indicative stormwater management feature details and their location identified on the Structure Plan Image.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

14. The Structure Plan Text does not identify any details in relation to the expected water or wastewater networks.

Relief Sought

Consideration of whether the Structure Plan Text should include water and wastewater network details and addition of new sections / paragraphs if required.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

15. The proposed transportation and three waters infrastructure and restoration / creation of the gullies and reserves should be undertaken by the developer at no cost to Council.

Relief Sought

Addition of a new section and paragraph(s) (similar to the paragraph S20.2.26 of the Bardowie Industrial Precinct Structure Plan) clearly outlining that the transportation and three waters infrastructure, restoration of gullies and creation of reserves are to be undertaken by the developer of each stage and at no cost to Council.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

16. The Structure Plan Text does not reference long-tailed bats or the outcomes to be achieved via future consent processes (8,420 long-lived tree species, 20,000 native trees, shrubs and herbaceous plants, predator control and monitoring and \$200,000 contribution). Reference is considered warranted given the critically endangered status of the species and to ensure that appropriate mitigation measures undertaken at the subdivision stage.

Relief Sought

That the status of long-tailed bats and the outcomes to be achieved via future consent processes is added to the Structure Plan Text.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

17. Paragraph S27.2.33 identifies a list of technical reports that are intended to be read in conjunction with the Structure Plan. It is unclear whether the current technical reports contain sufficient information for Structure Plan to rely on.

Relief Sought

Consideration of whether the technical reports provide adequate information to ensure that the outcomes expressed will be achieved.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

2.8 Proposed Modified Rule Framework

Tree Removal / Pruning

1. There is no tree removal / pruning activity rule or standards proposed, which would mean that bat habitat trees could be removed as a permitted activity.

Relief Sought

That a rule is added (similar to Rule 10.4.2.22 - Airport Business Zone) to identify that removal / pruning of potential bat habitat trees will require resource consent for a Restricted Discretionary Activity.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

New Rule 2A.4.2.69 – Neighbourhood Centres

2. At 1.25ha each, the proposed neighbourhood centres could be too large and have effects on existing commercial centres. Additionally, while the minimum 3m wide verandah requirement 2A.4.2.69(d) would be consistent with existing Commercial Zone standard, it does not provide for a 0.5m setback from the road kerb.

Relief Sought

Consideration as to whether two neighbourhood centres up to 1.25ha each are appropriate to service the PC37 area.

That Rule 2A.4.2.69(d) is amended to be consistent with the existing District Plan Commercial Zone verandah design standards.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

New Rule 2A.4.2.70 – Post Construction Lighting

3. The Light Management Area proposed around the perimeter of the Medium Density Residential Zone (MDRZ) may not be appropriate, measurable or enforceable. For example, it is not clear how the Ecological Impact Assessment arrived at the 20m wide, the proposed 0.3 lux is a very low level of illuminance, and a large number of properties/dwellings would adjoin the Light Management Area once subdivided and developed.

Relief Sought

That the appropriateness, measurability and enforceability of New Rule 2A.4.2.70 is confirmed.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

New Rule 15.4.2.1B – Average Dwelling Density

4. While the rule attempts to address density targets, the outcome would not guarantee a dwelling density of 25/ha is achieved. If a subdivision application did not meet 25 dwelling/ha, there would be no relevant standard for the PC37 area under Rule 15.4.2.1. Adding minimum and average net lot areas under Rule 15.4.2.1 would be consistent how the District Plan currently controls density, more likely to achieve the intended density and could be relied upon at the time of subdivision.

Relief Sought

That New Rule 15.4.2.1B is deleted and new minimum and average net lot size standards for the PC37 area are added into Rule 15.4.2.1.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

New Rule 15.4.2.91A – Subdivision Parameters

5. Although Section 5.6 of the Integrated Traffic Assessment identifies that *“a vehicle access restriction is proposed along the Maungatautari Road frontage of the site, to minimise conflict with the Te Awa River Ride shared path”*, there is no rule proposed to prevent direct access from lots to Maungatautari Road.

Relief Sought

That New Rule 15.4.2.91A is amended to add a clause to ensure that there is no direct access from lots or activities to Maungatautari Road and that Rule 15.4.2.8 shall apply to the road.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

6. The gully restoration and the Landscape Concept Plan requirements for each development / subdivision stage need to be more specific to ensure the intended outcomes are achieved.

Relief Sought

That New Rule 15.4.2.91A clauses (b) and (c) are amended to list specific minimum requirements for gully restoration planting and Landscape Concept Plans.

Or any other relief considered necessary and appropriate to address the issues raised by this submission.

New Rule 15.4.2.91B – Subdivision Parameters

7. As the Structure Plan does not include details of the indicative stage boundaries and internal roading or pedestrian / cycle networks, it is unclear whether the proposed timing triggers and requirements are appropriate. The current wording of New Rule 15.4.2.91B would enable 110 additional dwellings with no upgrades or improvements to the roading network.

Relief Sought

Amend the wording to ensure upgrades and improvements to the roading network are to be provided in advance of development.

Or any other relief considered necessary and appropriate to address the issues raised by this submission. 268



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