7 POLICY ASSESSMENTS

7.1 Part 2

Plan changes are subject to the Purpose and Principles of the RMA (sections 5-8) with the overriding purpose being 'to promote the sustainable management of natural and physical resources'.

The plan will achieve the overall purpose of the RMA. This location is appropriate for residential development as outlined in the above reporting. The evaluation of costs and benefits in Section 3 of this report outlines how the social, economic and cultural wellbeing of people and communities are provided for.

The Plan Change adopts planning methods that are already in the District Plan and considered to achieve the purpose of the Act.

Section 6 includes Matters of National Importance that are required to be recognised and provided for. The following matters are considered to be relevant to this plan change:

- (e)the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga
- (f)the protection of historic heritage from inappropriate subdivision, use, and development.

As set out in Section 6.4 consultation with tangata whenua is under way and a Cultural Values Assessment (CVA) is being prepared in accordance with Appendix P. There are no known historic heritage features on or within the immediate vicinity of the site.

There are matters in Section 7, Other Matters, and Section 8, Treaty of Waitangi, that are relevant to this plan change. The relevant parts are set out as follows.

Section 7 lists Other Matters to which particular regard must be had to. The relevant matters are:

(a) kaitiakitanga:
(aa) the ethic of stewardship:
(b) the efficient use and development of natural and physical resources:
(c) the maintenance and enhancement of amenity values:
(d) intrinsic values of ecosystems:
(f) maintenance and enhancement of the quality of the environment:
(g) any finite characteristics of natural and physical resources:
(h) the protection of the habitat of trout and salmon:
(i) the effects of climate change:
(j) The benefits to be derived from the use and development of renewable energy.

The proposal is an efficient use of land, allowing for residential development to occur in an appropriate location. Infrastructure will be provided to maximise the development potential of the land and to ensure that environmental effects are avoided in the first instance and thereafter

mitigated on the surrounding environment. Further to allowing for development of the growth cell, the plan change provides for the restoration and enhancement of the waterways, wetland and SNA while allowing for stormwater management, recreation opportunities and creating a high level of amenity in what will otherwise be a largely built environment.

Section 8 requires that 'all persons exercising functions and powers under it, in relation to managing the use, development and management of natural resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi)'. This section places an obligation on decision makers to act in accordance with it. The principles have been taken into account through Iwi consultation and the planned development of a CIA as part of the process.

7.2 National Policy Statements

7.2.1 National Policy Statement for Urban Development

A policy assessment has been undertaken against the relevant policies of the National Policy Statement for Urban Development (NPS UD) and is attached as Appendix Q. The key points in this assessment are summarised below.

- There is significant market demand for this development.
- The development will add significantly to development capacity; and
- The proposal will form part of a well-functioning urban environment.

Based on the above, the proposed plan change is consistent with the NPS UD.

7.2.2 National Policy Statement for Highly Productive Land

A policy assessment has been undertaken against the relevant policies of the National Policy Statement for Highly Productive Land (NPS HPL) and is attached as Appendix R. The key points of this assessment are summarised below.

- The site contains highly productive land;
- To allow urban rezoning of highly productive land criteria under clause 3.6 must be met.
- An assessment against the criteria in clause 3.6 found that:
  - The urban rezoning is required to provide sufficient development capacity to meet demand for housing or business land to give effect to the NPS UD;
  - There are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment; and
  - The environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production.
- The proposal meets the criteria set out under clause 3.6.

Based on the above, the proposed plan change is consistent with the relevant policies of the NPS HPL.

7.3 National Environmental Standards

7.3.1 National Environmental Standards for Freshwater

There are several National Environmental Standards for Freshwater (NES F) relevant to this proposal.

While these will be subject to consents applied for with WRC, they have been addressed as part of the development of the structure plan. Regulations relevant to the NES F include provisions protecting natural inland wetlands. Wetlands have been identified via a wetland delineation assessment attached as Appendix J. There is also a watercourse running through the site. These features and the relevant NES F regulations have been taken into account in the development of the structure plan. Consents for relevant activities under the NES F will be applied for prior to any physical works. As set out in Section 6.2 pre-application meetings have been held with WRC and they agree in principle with the approach.

On this basis, the proposal is consistent with the relevant standards of the NES F.

7.3.2 National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

In accordance with the NES CS), a PSI has been undertaken on the site and is attached as Appendix I. This PSI includes the following in its summary:

A number of isolated potential and confirmed HAIL activities were identified and evaluated at the site (i.e., livestock dipping, offal pit, asbestos and lead-based paint use, storage of chemicals and treated wood, motor vehicle workshop, burn pit). Overall, the risk assessment highlighted that these HAIL areas were isolated and small scale, and subsequently determined as low to moderate risk to human health. However, in the absence of quantitative soil data, the risk of these areas to human health could not be concluded as highly unlikely. Therefore, these areas are identified as 'pieces of land' until quantitative soil data at these locations is collected and assessed. It is recommended that the sampling plan for additional sampling is designed following the development of the site concept plan for the development. The additional information and data is recommended to be presented as a Detailed Site Investigation (DSI).

The relevant provisions of the NES CS further to those covering change of land use, including a DSI will be addressed as part of future consents prior to any physical works occurring. Future works will occur in accordance with the relevant provisions of the NES CS.

On this basis, the proposal is consistent with the relevant standards of the NES CS.

7.4 National Adaptation Plan and Emissions Reduction Plan

From 30 November 2022, it is a legal requirement for local government to 'have regard to' the national adaptation plan and the emissions reduction plan when preparing or changing RMA regional

policy statements, regional plans, and district plans. This requirement is to ensure that planning nationwide is in line with New Zealand's long-term climate strategies and goals.

7.4.1 National Adaption Plan (NAP)

The NAP focuses on the risks from natural hazards and how these matters can be considered. This is relevant to how stormwater will be dealt with in the growth cell. While this will be subject to a WRC consent, a Stormwater Masterplanning Assessment has been undertaken for the site and is attached as Appendix H.

Development will be subject to a low risk from flood hazard after development is completed. The Stormwater Masterplanning Assessment includes recommendations that the final consented design for stormwater is hydrologically neutral for the development during minor and major rainfall events. As a result, flooding risk to downstream property will not be increased.

7.4.2 Emissions Reduction Plan

The ERP includes guiding principles on emissions reduction and addresses various sectors. Relevant sectors for this private plan change are the transport sector and the building and construction sector. The ERP supports low-emission transport infrastructure that:

- enables people to walk, cycle and use public transport;
- reduces vehicle kilometres travelled by private vehicles; and
- supports low-emission private vehicles (primarily electric).

For this proposal, the growth cell enables walking and cycling and is located on an existing public transport route. New developments give the opportunity for EV charging infrastructure to be included in builds as opposed to retrofitted into existing buildings.

There is no actual building or construction related to the plan change but the plan change seeks to enable future building and construction. The private plan change does not seek to change any objectives or policies in the plan related to building and construction.

7.5 Waikato Regional Policy Statement

An assessment against the Waikato Regional Policy Statement (RPS) has been undertaken and is attached as Appendix Y, principally the Built Environment and General Development Principles

The proposal gives effect to the RPS, other than the policies on urban limits.

The operative RPS does not comply with the NPS UD requirement for Responsive Planning under Subpart 2 – Policy 3.8. Futureproof includes out of sequence policy proposal, intended to be included in the RPS. This is set out below.

7.5.1 Future Proof

Future proof is a joint project set up by the partners to consider how the sub-region should develop into the future. Future proof partners include: Ngā Karu Atua o te Waka, Waikato-Tainui, Tainui

Waka Alliance, Waikato Regional Council, Waipa District Council, Waikato District Council, Hamilton City Council, Matamata Piako District Council, Waka Kotahi and Waikato District Health Board.

Future Proof includes a pathway for out of sequence growth to occur. An assessment against the out of sequence growth criteria has been included as Appendix S. An assessment against the Future Proof Strategy Growth Management Directives has also been undertaken and is attached as Appendix T.

The proposed plan change meets the out of sequence growth criteria and is consistent with the future proof strategy growth management directives.

7.6 Te Ture Whaimana o Te Awa o Waikato - Vision and Strategy for the Waikato River

An assessment against Te Ture Whaimana has been undertaken and is attached as Appendix U.

The key points of this assessment are summarised below;

- Wetlands on site will be protected and enhanced;
- A Riparian and Waterways Protection and Enhancement Plan included as part of the proposal ensures the protection, enhancement and utilisation of existing waterways;
- Consideration of the Vision and Strategy for the Waikato River will also occur as part of future consents for the site, including the stormwater discharge consent.

On this basis, the proposed plan change is consistent with the Vision and Strategy.

7.7 Waikato Tainui Environmental Management Plan–Tai Tumu Tai Pari Tai Ao

An assessment against the relevant sections of the Waikato Tainui Environmental Management Plan–Tai Tumu Tai Pari Tai Ao has been undertaken and is attached as Appendix V. The goal of Waikato-Tainui is to ensure that the needs of present and future generations are provided for in a manner that goes beyond sustainability towards an approach of environmental enhancement. The key points in the assessment are summarised below.

- The proposal is aligned with the following chapters of the management plan;
  - Te Wai Maori –Fresh Water
  - Ngaa Repo – Wetlands
  - Whenua – Land
  - He Mahinga Ika – Fisheries
  - Te Ararangi – Air
  - Ngaa Whakaritenga Moo Ngaa Whenua O Waikato-Tainui – Land Use Planning
  - Waihanga Matua–Infrastructure

The proposal will result in the protection and enhancement of existing waterways and wetlands on site.

On this basis, the proposed plan change is consistent with the Waikato Tainui Environmental Management Plan–Tai Tumu Tai Pari Tai Ao.

7.8 Ko Tā Maniapoto Mahere Taiao–Maniapoto Environmental Management Plan

Ko Tā Maniapoto Mahere Taiao is a high-level direction setting document and describes issues, objectives, policies and actions to protect, restore and enhance the relationship of Maniapoto with the environment including their economic, social, cultural and spiritual relationships. The Plan is also a tool to support the leadership of Maniapoto at the forefront of exercising kaitiakitanga and rangatiratanga within the Maniapoto rohe.

The proposed Growth Cell is not directly adjacent to the Waipa River however it is within the catchment that feeds into the Waipa River. The proposed changes to the provisions and zonings provide for land management and land use which protects the interconnected relationships of the natural environment in accordance with the principles of Ko Tā Maniapoto Mahere Taiao.

7.9 Te Rautaki Taiao a Raukawa-Raukawa Environmental Management Plan

Te Rautaki Taiao a Raukawa, the Raukawa Environmental Management Plan provides a statement of values, experiences and aspirations pertaining to the management of, and relationship with the environment. It assists in engagement in policy and planning processes and resource management decisions. The Management Plan offers broad objectives in relation to this matter.

The Raukawa takiwā includes both Cambridge and Te Awamutu, and the land in the southern portion of the Waipa District. The Growth Cell applies Low Impact Design Principles and will result in activities occurring at appropriate locations and scales in accordance with the objectives and outcomes sought by Te Rautaki Taiao a Raukawa.

7.10 Ngāti Koroki Kahukura

The ancestral tribal rohe of Ngāti Koroki Kahukura spans from Southern Hamilton City, following the Waikato River to the northern end of Lake Arapuni, inland to western Te Awamutu and through again to southern Hamilton City encompassing Mount Maungatautari and many kāinga settlements. Although there is no Joint Management Agreement in place with Ngāti Koroki Kahukura, they are part of the local tangata whenua and for this reason are included and will be consulted with as part of this plan change process.

7.11 Waikato Regional Plan

There are no WRC consents proposed as part of the plan change. Assessments against objectives and policies relevant to future applications will be undertaken at the time. The Stormwater Masterplanning Document will inform the future consents ensuring they are consistent with the

relevant objectives and policies of the WRP. Overall, the proposed plan change is consistent with the relevant policies of the Waikato Regional Plan.

7.12 Operative Waipa District Plan

An assessment against the WDP has been undertaken and is attached as Appendix W. The key points in the assessment are summarised below.

- The Growth Cell and Structure Plan suitable with regards to address natural hazards, reverse sensitivity and designed/layout.
- The Growth Cell can be appropriately serviced with necessary infrastructure.
- The existing SNA on the site is protected, enhanced and utilised as part of the Growth Cell.

On this basis, the proposed plan change is consistent with the WDP.

7.13 Policy Assessment Conclusion

Based on the relevant assessments in this section, the plan change is consistent with the relevant provisions of the applicable planning documents.

National Policy Statement on Urban Development 2020

Provision		Assessment
Objective 1	New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will enable people to provide for their social, economic, and cultural wellbeing now and into the future through providing quality housing with associated amenity and infrastructure for the aging population with the target demographic is the population aged 55 years and above. An economic assessment of the proposed plan change has been undertaken to support the plan change. A copy of this report has been included as an appendix of the plan change request titled 'Economic Assessment of Proposed Private Plan Change in Te Awamutu' This report concludes that there is significant market demand for this development for both the ageing demographic and the market segment in terms of affordability. The proposed development offers a range of housing varying from villas to townhouses or apartments and serviced studios as well as on site community facilities. An Urban Design Statement has been completed for the proposed development. This includes commentary affirming that the proposal would form part of a well-functioning urban environment as defined in the NPS UD. The proposed development has been designed in accordance with Te Aranga Design Principles. Iwi engagement and consultation is ongoing. An Integrated Traffic Assessment (ITA) has been completed in support of the proposal. This includes a several recommendations which are adopted as part of the proposal. This includes the incorporation of walking and cycling facilities and the provision for new public transport facilities. The report concludes that the proposal provides
Policy 1	Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: (a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms; and (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and (f) are resilient to the likely current and future effects of climate change.	

Provision		Assessment
		for multimodal connectivity and improves road safety for existing properties. The following assessment has been taken from the ITA *'The proposed plan change area adds to the existing urban form of Te Awamutu. It brings forward delivery of an already planned walking and cycling link along Ohaupo Road SH3, proving a much-needed active mode connection to existing residential area in the northern part of the town which is currently under served. The new site access roundabout will also include walking and cycling infrastructure which will extend into the site along the new road network, supported by off road recreational pathways through greenspaces within the site. These greenspaces retain existing wetlands and area of ecological value, providing access to natural open spaces. The proposed plan change area also plans for connection to adjacent areas.* *The plan change area will include provision for public transport stops within the new Ohaupo SH3 access and corridor, providing for increased public transport accessibility for existing and new residents along what is identified as a future frequent network for public transport. The internal road network connectivity to adjacent land also allows for public transport within the site.* *The location of the plan change area adjacent to the existing urban form, together with the active mode and public transport opportunities encourages population growth within Te Awamutu and subsequently promotes the overall town as a viable provider for an increased range of goods and services, reducing the need to travel elsewhere to access these. This has the potential to reduce the distance needed to be travelled and therefore to positively impact on greenhouse gas emissions.'*

Provision		Assessment
		The proposal has been developed taking into account natural hazards, in particular flooding and the site's ability to manage stormwater ensuring it is resilient to the future effects of climate change.
Objective 2	Planning decisions improve housing affordability by supporting competitive land and development markets.	The addition of the requested plan change will provide development capacity for a site with a development planned and funded by a developer for a specific demographic. An economic assessment of the proposed development has been prepared in support of the private plan change. This report identifies that "significant additional residential land needs to be identified and enabled as soon as possible to meet the NPS-UD obligations, and to allow the local market to function properly". A copy of this report has been included as an appendix of the plan change request titled 'Economic Assessment of Proposed Private Plan Change in Te Awamutu'. By providing housing targeted for the demographic aged 55 and above, the provision of supply of housing for this demographic will result in an increased in supply of the houses that are currently occupied by the target demographic. This will result in an increased variety of houses on the market.
Policy 2	Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	
Objective 3	Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: (a) the area is in or near a centre zone or other area with many employment opportunities (b) the area is well-serviced by existing or planned public transport	The site is located approximately 2km from Te Awamutu town centre. As set out in the Urban Design Statement, due to the relatively small size of Te Awamutu and the proposed structure plan, the proposal is considered to form part of a well-functioning urban environment. Further to the Urban Design Statement, a Integrated Transport Assessment has been completed in support of the proposal. The proposal includes the provision of multimodal transport, including footpaths, cycle access and access to existing public transport.

Provision		Assessment
	(c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The proposed plan change will enable people to live in a lifestyle and retirement village where demand for housing for the 55 and above demographic that is the target market has been identified in the supporting economic assessment.
Objective 4	New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations	The proposed development seeks to address the demand of the aging population. The development seeks to provide a range of living options and amenities for this demographic.
Objective 6	Local authority decisions on urban development that affect urban environments are: (a) integrated with infrastructure planning and funding decisions; and (b) strategic over the medium term and long term; and (c) responsive, particularly in relation to proposals that would supply significant development capacity.	The proposed development includes the provision of connections and necessary infrastructure upgrades to cater for demand created. The plan change request sets out how the site meets all of the appropriate planning matters to be included as a growth cell. This is further detailed in the assessment against future proof. See below assessment against policy 8.
Policy 6	When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:	
	(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement	
	(b) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement: (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and	

Provision		Assessment
	(ii) are not, of themselves, an adverse effect	
	(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)	
Policy 8	Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; (b) or out-of-sequence with planned land release	This policy imposes positive duty on local authorities to consider unanticipated development. This is within a wider context of central government seeking to increase the supply of land for housing. The proposed plan change will add to the development capacity in two ways. It will add significant development capacity for Te Awamutu by providing housing and a well-functioning urban environment in the 25ha development, with planned capacity for 400 household equivalents. The proposed development aims to cater for the growing market demand from an older demographic needing smaller units with low maintenance. A consequence of this is the freeing up of larger houses currently occupied by the intended occupants of the proposed development. The freeing up of these properties will add to development capacity both living in the existing dwelling or develop the site by either utilising the Medium Density Residential provisions in the RMA or other development resulting in intensification of the site. An economic assessment of the proposed development has been prepared in support of the private plan change. This report identifies that "significant additional residential land needs to be identified and enabled as soon as possible to meet the NPS-UD obligations, and to allow the local market to function properly". A copy of this report has been included as an appendix of the plan change request titled

Provision		Assessment
		'Economic Assessment of Proposed Private Plan Change in Te Awamutu'.
Policy 9	Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:	Hapū and iwi have been informed and involved in the development of the proposal. This relationship is ongoing. The proposed development and master plan has been designed to incorporate the Te Aranga Design principles. The low impact design stormwater system, incorporating ecological protection and enhancement, supports the Vison and Strategy for the Waikato River.
	(a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and	
	(b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and	
	(c) operate in a way that is consistent with iwi participation legislation.	

National Policy Statement for Highly Productive Land 2022

Provision		Assessment
Objective	Highly productive land is protected for use in land-based primary production, both now and for future generations.	
Policy 5	The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.	The proposal includes the urban rezoning of a site that includes highly productive land. This is provided for through section 3.6 of the NPS. Section 3.6 sets out criteria that must be met if Tier 1 or 2 territorial authority is to allow the urban rezoning of highly productive land. This is addressed below in 3.6.
Policy 6	The rezoning and development of highly productive land as rural lifestyle is avoided, except as provided in this National Policy Statement.	The proposed development avoids rezoning and development of the site as rural lifestyle.
Policy 7	The subdivision of highly productive land is avoided, except as provided in this National Policy Statement.	As addressed above in the assessment against Policy 5 and below against section 3.6 and 3.10 of this policy, the proposed development is required to provide sufficient development capacity, there are no other reasonable practicable and feasible options, and the benefits associated with the development outweigh the loss of the highly productive land. On this basis, the proposed development is not an inappropriate use and development.
Policy 8	Highly productive land is protected from inappropriate use and development.	
S3.6(1)	Tier 1 and 2 territorial authorities may allow urban rezoning of highly productive land only if:	

Provision		Assessment
	(a) the urban rezoning is required to provide sufficient development capacity to meet demand for housing or business land to give effect to the National Policy Statement on Urban Development 2020; and	An economic assessment of the proposed development has been prepared in support of the private plan change. A copy of this report has been included as an appendix to the plan change request titled 'Economic Assessment of Proposed Private Plan Change in Te Awamutu'. The report concludes that "significant additional residential land needs to be identified and enabled as soon as possible to meet the NPS-UD obligations, and to allow the local market to function properly". The report sets out that the proposed urban rezoning of the site is required to provide sufficient development capacity to meet demand for housing or business land to give effect to the National Policy Statement on Urban Development 2020.

<table>
<tr><th>Provision</th><th></th><th>Assessment</th></tr>
<tr><td></td><td>(b) there are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment; and</td><td>
The Waipa Growth strategy identifies the need for Te Awamutu to develop to allow for another 2,988 houses between now and 2035 and a further 3,036 houses between 2035 and 2050.

The development capacity for these houses is provided in Growth Cells that are identified in the Waipa District Plan. There is an assumption that for there will be a house for every 830m².

There are a number of factors that are constraints to development within these sites. Since the growth cells were identified in 2009 there has been significant changes in national urban policy and rules that have added further constraints to development.

The table below compares the 2009 growth strategy assessment matters to the 2022 assessment criteria. This table demonstrates the policy led change in considerations since the growth cells were identified.
<table>
<tr><th colspan="2">2009 Assessment Matters</th><th colspan="2">2022 Assessment Criteria</th></tr>
<tr><td>Living/Working</td><td>Desirability</td><td rowspan="3">Well-Functioning Urban Environment</td><td rowspan="3">Good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport</td></tr>
<tr><td>Connections</td><td>Connection to existing urban area infrastructure (hard and community)</td></tr>
<tr><td>Accessibility</td><td>Proximity to Key Transport links</td></tr>
<tr><td>Ability to Change</td><td>Ownership</td><td rowspan="2">Feasibility/Affordability</td><td>Ownership and use</td></tr>
<tr><td>Affordability</td><td>Servicing costs</td><td>Servicing feasibility and cost. Previous investment for growth futureproofing</td></tr>
<tr><td rowspan="3">Protection</td><td rowspan="3">Ecology
Quality Soils
Suitability</td><td>Ecology/Biodiversity</td><td>Waterways and wetland protection</td></tr>
<tr><td rowspan="2">Highly Productive Land</td><td>LUC 1-3</td></tr>
<tr><td>LUC other</td></tr>
</table>
</td></tr>
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Provision		Assessment

		Natural Hazards	Stability – peat, slope
			Flooding

Constraints to development factors include but are not limited to:

- Highly productive land
- Waterways
- Flood hazards
- Wetlands
- Infrastructure constraints
- The number of land parcels within a growth cell

A mapping exercise and associated data analyses has been undertaken to assess how the capacity of current growth cells will likely be affected by these constraints. The mapping and associated data is included in the application titled Te Awamutu Development Limited Growth Cell Analysis Data.

This assessment demonstrates there are significant development constraints within the growth cells. The analysis of this information provides the following data:

Total Growth Cells area:	615.75ha
Growth Cells LUC2 area:	256.6ha
Growth Cells LUC3 area:	94.84ha
Growth Cells Total HPL area:	351.44ha
Deferred Growth Cells area:	208.87
Deferred Growth Cells LUC2 area:	76.09ha
Deferred Growth Cells LUC3 area:	45.99ha
Deferred Growth Cells HPL area:	122.08ha
Growth Cells WRC Flood Hazard area:	61.75ha
Growth Cells RCP6 1% AEP flooding area:	100.15ha
Growth Cells total River length:	8708m

Provision		Assessment
		This analysis shows that at least 100ha or 15% of the total growth cell area has significant development constraints. The shortfall of this amount of land set aside for development can be substituted by the proposed site. Further to this, analysis of this data has been undertaken ranking the sites against develop constraints criteria. The data analysis shows that the proposed site would rank: • 9th out of 15 for total LUC2 area. 98.1% (251.7ha) of the total area of LUC2 being in the 8 growth cells ranked higher (1st–8th) • 8th out of 15 for total HPL area. 83%(223.2ha) of the total HPL being in the 7 growth cells ranked higher • Total Wetland area 7th out of 15. 90%(11.3ha) of the total Wetland areas land being in the 6 growth cells ranked higher • Only one other growth cell has a single owner. Growth cells where development has not occurred have an average of 6.8 properties per growth cell. Inclusion of the proposed development area as a growth cell will improve the long term outcomes for protection of highly productive land and wetlands when compared to the existing strategy. The proposal includes the servicing of wastewater, Potable water and stormwater and the associated costs of any infrastructure. Taking into account the proposed upgrades, there is sufficient capacity for the servicing of wastewater, Potable water and stormwater. In response to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (RMA-EHS), WDC has initiated a Plan Change 26 to increase and accelerate housing intensification in Waipa. As part of this they are required to incorporate medium density housing standards into every relevant residential zone, subject to certain qualifying matters. Map 57 of proposed plan change 26 shows areas where the qualifying matters apply in proximity to a river or a gully, have significant stormwater constraints or have infrastructure constraints. This map shows that large areas of Te

Provision		Assessment
		Awamutu and Kihikihi have significant constraints to intensification. This shows that there is very limited additional development capacity likely to be delivered through intensification. A copy of this map is included below. The urban design assessment concludes that the Development Area will contribute to well-functioning urban environment in Te Awamutu. However, this is not a major determining factor in a small rural town with high levels of accessibility throughout. Consideration of alternatives that would involve the rezoning of land that is not highly productive land as urban, an analysis of the overview map. There is a strip of land not mapped as HPL that runs along the southwestern boundary of the urban extent of Te Awamutu bordering growth cells T2, T12, T4, T5 and T6. When taking into account that this land is also be subject to potential development constraints discussed above, and the proven need for significant amounts of land to meet the development capacity. Even with the rezoning of the non-HPL there is still a need for further development capacity. Overall, the following has been identified: • The growth strategy identifying the growth cells and associated development assumptions does not give appropriate weight to considerations under current national policy direction • The existing growth cells have significant constraints that are estimated to reduce the likely develop capacity by at least 100ha. • When ranked against the existing growth cells, the proposed development area has a lower than average extent of HPL. • Wetlands are present on the development area, but these have been delineated and do not significantly constrain development. Wetlands have been incorporated into protected natural areas and stormwater management system. • There are significant constraints to intensifying within the existing Te Awamutu and Kihikihi urban extent. • There are no significant constraints to servicing the development area, and development is feasible.

Provision		Assessment
		• The proposed development would form part of a well-functioning urban environment. • On this basis, it is considered that there are no other reasonably practical and feasible options to meet the development capacity required within the same locality and market while achieving a well-functioning urban environment.
	(c) the environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary	Economic assessment of the proposed development has been prepared in support of the private plan change. Having determined the need for the proposal as discussed above in s3.6(1)(a), the economic report assesses the likely economic costs and benefits. The concludes that "given the strong and enduring benefits of the proposal, and noting the absence of any material economic cost, we support it on economic grounds".

Provision		Assessment
	production, taking into account both tangible and intangible values.	Since the 1980s the land has been used to graze dry stock (cattle) and only a small number of sheep at any one time. The stock rate on the farm has been low. Whilst the site contains highly productive land, this is not all uniform and there are a number of constraints limiting the utilisation of the highly productive land to maximise land-based primary production. Constraints include waterways, wetlands, steep areas and a Kahikatea Stand. It is acknowledged that many of the constraints to the maximization of production of highly productive land are also constraints to development. These constraints have been considered and addressed as part of the overall proposal. Overall, the environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.
S3.6(2)	In order to meet the requirements of subclause (1)(b), the territorial authority must consider a range of reasonably practicable options for providing the required development capacity, including: (a) greater intensification in existing urban areas; and (b) rezoning of land that is not highly productive land as urban; and (c) rezoning different highly productive land that has a relatively lower productive capacity	The assessment against 3.6(1) considers the requirements of S3.6(2).
S3.6(3)	In subclause (1)(b), development capacity is **within the same locality and market** if it:	See assessment against 3.6(1) considers the requirements of S3.6(3).

Provision		Assessment
	(a) is in or close to a location where a demand for additional development capacity has been identified through a Housing and Business Assessment (or some equivalent document) in accordance with the National Policy Statement on Urban Development 2020; and (b) is for a market for the types of dwelling or business land that is in demand (as determined by a Housing and Business Assessment in accordance with the National Policy Statement on Urban Development 2020).	
S3.7	Avoiding rezoning of highly productive land for rural lifestyle	The proposal avoids rezoning of highly productive land for rural lifestyle.
S3.8	Avoiding subdivision of highly productive land	Urban rezoning complies with Policy 3.6, and Policy 3,8 is not relevant.
S3.9	Protecting highly productive land from inappropriate use and development	Urban rezoning complies with Policy 3.6. The proposed development is not an inappropriate use and development of highly productive land.

Provision		Assessment
S3.10	Exemption for highly productive land subject to permanent or long-term constraints	S3.10 is directly relating to exemptions from sections 3.7, 3.8 or 3.9, none of which are relevant to this proposal.

Qualifying Matter - River/Gully Proximity
Qualifying Matter - Stormwater Constraint
Qualifying Matter - Infrastructure Constraint

Qualifying Matters - Te Awamutu/Kihikihi

Map 57

Waipā District Plan

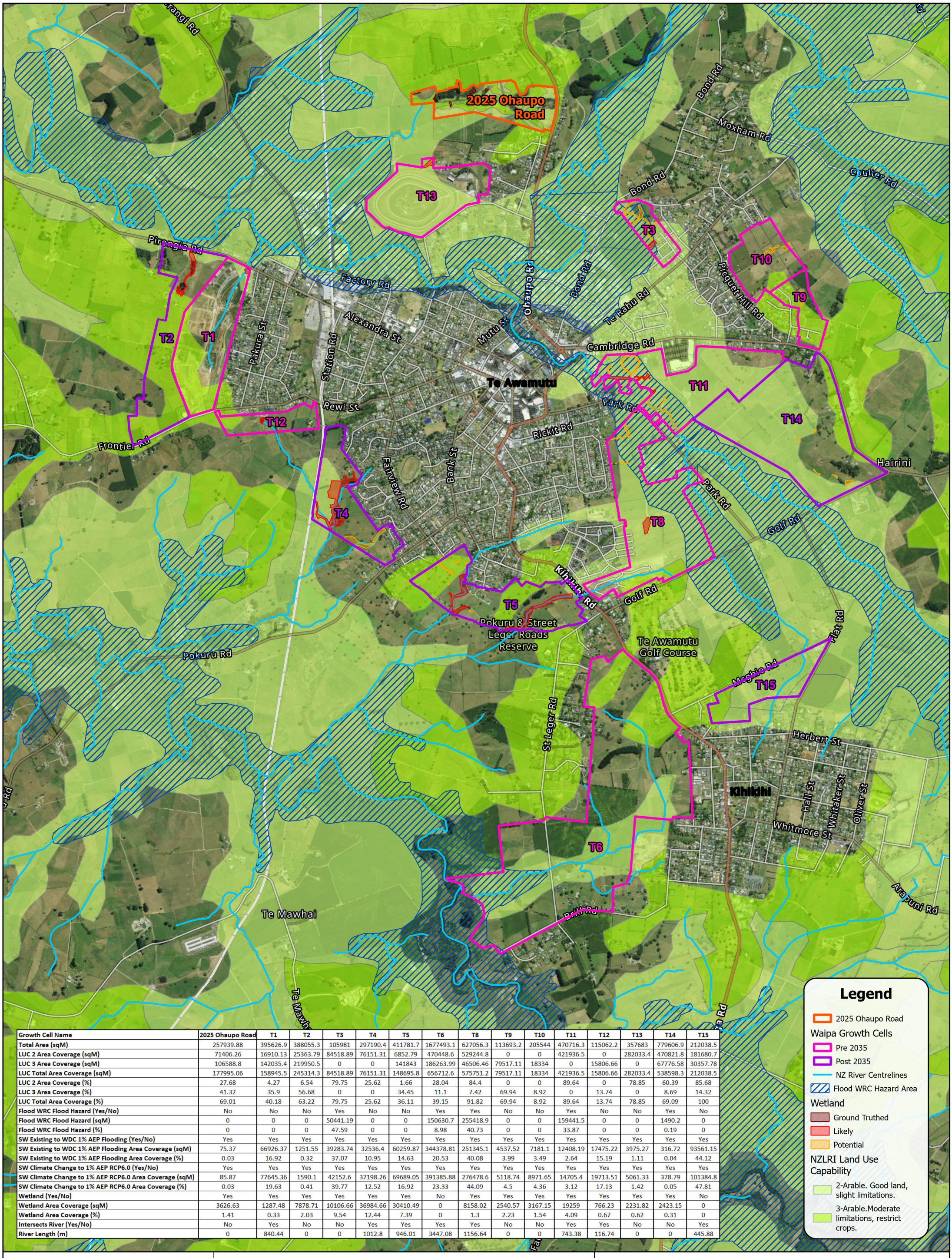
As Proposed by Plan Change 26

Scale: 1 : 20,000 at A3

0 0.2 0.4 0.6 0.8 1 km

N

Waipā DISTRICT COUNCIL



Growth Cell Name	2025 Ohaupo Road	T1	T2	T3	T4	T5	T6	T8	T9	T10	T11	T12	T13	T14	T15
Total Area (sqM)	257939.88	395626.9	388055.3	105981	297190.4	411781.7	1677493.1	627056.3	113693.2	205544	470716.3	115062.2	357683	779606.9	212038.5
LUC 2 Area Coverage (sqM)	71406.26	16910.13	25363.79	84518.89	76151.31	6852.79	470448.6	529244.8	0	0	421936.5	0	282033.4	470821.8	181680.7
LUC 3 Area Coverage (sqM)	106588.8	142035.4	219950.5	0	0	141843	186263.99	46506.46	79517.11	18334	0	15806.66	0	67776.58	30357.78
LUC Total Area Coverage (sqM)	177995.06	158945.5	245314.3	84518.89	76151.31	148695.8	656712.6	575751.2	79517.11	18334	421936.5	15806.66	282033.4	538598.3	212038.5
LUC 2 Area Coverage (%)	27.68	4.27	6.54	79.75	25.62	1.66	28.04	84.4	0	0	89.64	0	78.85	60.39	85.68
LUC 3 Area Coverage (%)	41.32	35.9	56.68	0	0	34.45	11.1	7.42	69.94	8.92	0	13.74	0	8.69	14.32
LUC Total Area Coverage (%)	69.01	40.18	63.22	79.75	25.62	36.11	39.15	91.82	69.94	8.92	89.64	13.74	78.85	69.09	100
Flood WRC Flood Hazard (Yes/No)	No	No	No	Yes	No	No	Yes	Yes	No	No	Yes	No	No	Yes	No
Flood WRC Flood Hazard (sqM)	0	0	0	50441.19	0	0	150630.7	255418.9	0	0	159441.5	0	0	1490.2	0
Flood WRC Flood Hazard (%)	0	0	0	47.59	0	0	8.98	40.73	0	0	33.87	0	0	0.19	0
SW Existing to WDC 1% AEP Flooding (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
SW Existing to WDC 1% AEP Flooding Area Coverage (sqM)	75.37	66926.37	1251.55	39283.74	32536.4	60259.87	344378.81	251345.1	4537.52	7181.1	12408.19	17475.22	3975.27	316.72	93561.15
SW Existing to WDC 1% AEP Flooding Area Coverage (%)	0.03	16.92	0.32	37.07	10.95	14.63	20.53	40.08	3.99	3.49	2.64	15.19	1.11	0.04	44.12
SW Climate Change to 1% AEP RCP6.0 (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
SW Climate Change to 1% AEP RCP6.0 Area Coverage (sqM)	85.87	77645.36	1590.1	42152.6	37198.26	69689.05	391385.88	276478.6	5118.74	8971.65	14705.4	19713.51	5061.33	378.79	101384.8
SW Climate Change to 1% AEP RCP6.0 Area Coverage (%)	0.03	19.63	0.41	39.77	12.52	16.92	23.33	44.09	4.5	4.36	3.12	17.13	1.42	0.05	47.81
Wetland (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Wetland Area Coverage (sqM)	3626.63	1287.48	7878.71	10106.66	36984.66	30410.49	0	8158.02	2540.57	3167.15	19259	766.23	2231.82	2423.15	0
Wetland Area Coverage (%)	1.41	0.33	2.03	9.54	12.44	7.39	0	1.3	2.23	1.54	4.09	0.67	0.62	0.31	0
Intersects River (Yes/No)	No	Yes	No	No	Yes	Yes	Yes	Yes	No	No	Yes	Yes	No	No	Yes
River Length (m)	0	840.44	0	0	1012.8	946.01	3447.08	1156.64	0	0	743.38	116.74	0	0	445.88

Legend

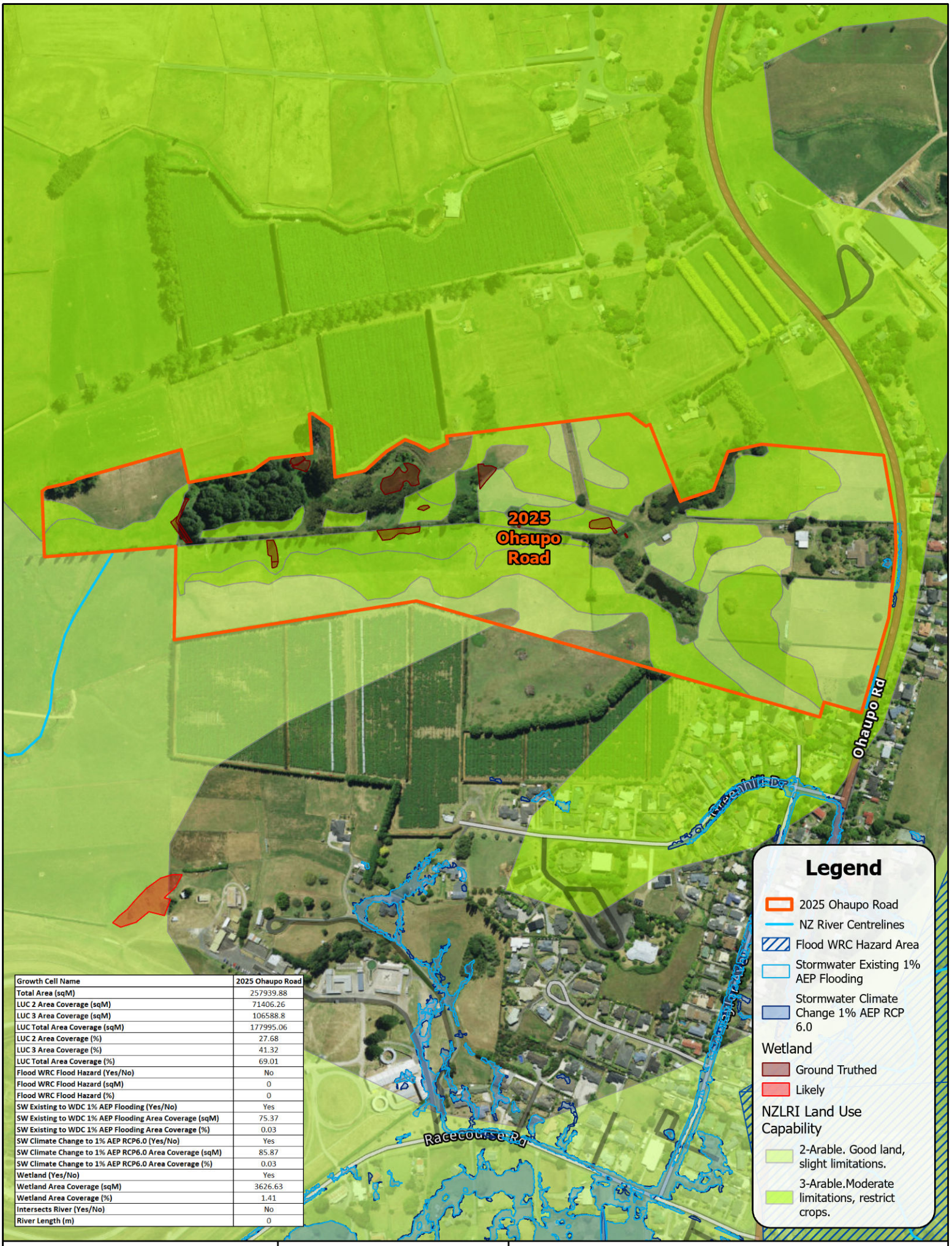
- 2025 Ohaupo Road
- Waipa Growth Cells
  - Pre 2035
  - Post 2035
- NZ River Centrelines
- Flood WRC Hazard Area
- Wetland
  - Ground Truthed
  - Likely
  - Potential
- NZLRI Land Use Capability
  - 2-Arable. Good land, slight limitations.
  - 3-Arable.Moderate limitations, restrict crops.

Growth Cell Analysis Overview

0 0.25 0.5 1 1.5 Kilometers

1:25,000

N



Growth Cell Name	2025 Ohaupo Road
Total Area (sqM)	257939.88
LUC 2 Area Coverage (sqM)	71406.26
LUC 3 Area Coverage (sqM)	106588.8
LUC Total Area Coverage (sqM)	177995.06
LUC 2 Area Coverage (%)	27.68
LUC 3 Area Coverage (%)	41.32
LUC Total Area Coverage (%)	69.01
Flood WRC Flood Hazard (Yes/No)	No
Flood WRC Flood Hazard (sqM)	0
Flood WRC Flood Hazard (%)	0
SW Existing to WDC 1% AEP Flooding (Yes/No)	Yes
SW Existing to WDC 1% AEP Flooding Area Coverage (sqM)	75.37
SW Existing to WDC 1% AEP Flooding Area Coverage (%)	0.03
SW Climate Change to 1% AEP RCP6.0 (Yes/No)	Yes
SW Climate Change to 1% AEP RCP6.0 Area Coverage (sqM)	85.87
SW Climate Change to 1% AEP RCP6.0 Area Coverage (%)	0.03
Wetland (Yes/No)	Yes
Wetland Area Coverage (sqM)	3626.63
Wetland Area Coverage (%)	1.41
Intersects River (Yes/No)	No
River Length (m)	0

Growth Cell Analysis
2025 Ohaupo Road

0 55 110 220 330
Meters

1:6,000

N

Growth Cell Name	2025 Ohaupo Road	T1	T2	T3	T4	T5	T6	T8	T9	T10	T11	T12	T13	T14	T15
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Flood (Yes/No)	No	No	No	Yes	No	No	Yes	Yes	No	No	Yes	No	No	Yes	No
Flood Area Coverage (sqM)	0	0	0	50441.19	0	0	150630.7	255418.9	0	0	159441.45	0	0	1490.2	0
Flood Area Coverage (%)	0	0	0	47.59	0	0	8.98	40.73	0	0	33.87	0	0	0.19	0
SW Existing (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
SW Existing Area Coverage (sqM)	75.37	66926.37	1251.55	39283.74	32536.4	60259.87	344378.81	251345.12	4537.52	7181.1	12408.19	17475.22	3975.27	316.72	93561.15
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SW Climate Change (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
SW Climate Change Area Coverage (sqM)	85.87	77645.36	1590.1	42152.6	37198.26	69689.05	391385.88	276478.64	5118.74	8971.65	14705.4	19713.51	5061.33	378.79	101384.83
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Wetland (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Wetland Area Coverage (sqM)	3626.63	1287.48	7878.71	10106.66	36984.66	30410.49	0	8158.02	2540.57	3167.15	19259	766.23	2231.82	2423.15	0
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Intersects River (Yes/No)	No	Yes	No	No	Yes	Yes	Yes	Yes	No	No	Yes	Yes	No	No	Yes
River Length (m)	0	840.44	0	0	1012.8	946.01	3447.08	1156.64	0	0	743.38	116.74	0	0	445.88

For:	Te Awamutu Developments Limited				
Copy:					
From:					
Date:	22/11/2022	**BTW Job Number:**	211365	**Client Reference**	

Subject: Desktop wetland assessment

Currently Waipa District Council (WDC) have 616 hectares set aside for development as set out in their growth strategy by way of growth cells. BTW have produced this memo to support and inform the Ohaupo road private plan change request.

This memo is a high-level desktop assessment to identify potential wetlands within the WDC growth cells. This is not a comprehensive wetland delineation, it is an offsite, rapid desktop review using pre-existing information to determine likelihood of wetland environments within each growth cell.

The scope of this memo included visual interpretation of existing aerial imagery (Retrolens and Google Satellite Map Service), hydrological, topographic and New Zealand Soil Classification (NZSC) data to determine the locations of potential wetlands. The output was polygons, conservatively, mapped around potential wetland areas.

Natural Wetlands

The National Policy Statement for Freshwater (NPS-FM) and the National Environmental Standards for Freshwater 2020 (NES-F) provide provisions for the protection of natural inland wetlands and place restrictions of certain activities in and around identified wetlands. The New Zealand Resource Management Act (1991) defines wetlands as '*permanently or intermittently wet areas, shallow water, and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions*'.

Natural inland wetlands have the highest regulatory protection under the above legislation. As earthworks activities within 10 metres of a natural inland wetlands are prohibited and stormwater fluctuations within 100 metres are non-complying activities, subdivision development can be significantly impacted by wetland features. For example, access roads, stormwater management and subdivision lot configuration can all be affected.

Natural inland wetlands in New Zealand are identified by using the MfE (2020) wetland delineation protocols. To meet the definition of a natural inland wetland, the site must meet three criteria those being:

1. Presence of Wetland Vegetation as determined by the MfE (2020) Wetland Vegetation tool

2. Presence of Wetland Hydrology as determined by MfE (2020) Wetland Hydrology Tool,

3. Presence of Wetland Soil as determined by the MfE (2020) Hydric Soil Tool.

Aerial Imagery Assessment

High resolution satellite imagery, New Zealand 10 m aerial imagery (LINZ CC-BY 3.0), was reviewed within the WDC growth cells. Visual evidence of wetland vegetation (plant community types, i.e., rushes, flax, reeds were conservatively distinguished by shape and colour relative to surrounding pasture) and wetness levels (standing water, emergent vegetation, dark tones showing areas of saturated soils).

Satellite imagery from February 2020 was reviewed due to the low soil moisture to highlight clear colour comparison between areas with water/higher soil moisture and those without (i.e., wetland areas are likely to be visible as areas of green while surrounding moisture stressed pasture is brown). Historic imagery from 1944 was also compared to show the historical extent of any 'relict" wetlands before extensive drainage took place[1].

Drainage patterns and wetness were considered in the aerial imagery. For example, closely spaced, open drains often indicate poorly drained conditions, and signs of pugging damage from cattle or damage from vehicles suggests the soil is wet and soft underfoot, which indicates soil is likely to be at least partially wet at some time of the year.

NZ Soil Classification Map (NZSC)

NZSC maps[2] were used to show the distribution of hydric soils within the area and identify potential wetland areas. 'Hydric soils' is a general term for soils that are poorly or very poorly drained and have a water table above, at, or near the ground surface long enough during the growing season to develop anaerobic conditions (Fraser et al, 2018). As described above hydric soils are one of the criteria required in the MfE (2020) wetland delineation protocols. Gley soils and Organic soils are the two main orders of hydric soils. These soils are poorly or very poorly drained and have features that indicate periodic or prolonged saturation. Other soil orders in the NZSC can have soils that cover a range of drainage classes (defined at the group and sub-group level), but they are usually not as saturated as Gley or Organic soils (Fraser et al, 2018).

Contour Maps

Contour maps (LINZ Topo50) were used to provide insight into the position in the landscape. The positions in the landscape can suggest areas that are more likely to be wet, i.e., low lying areas adjacent to open water and the base of slopes or valleys where seepage water accumulates and drains away (Fraser, et al 2018). However, sloping land can also have wet conditions, (for example spring fed wetlands on slopes), so landscape position was only used as a potential indicator of where wet soil might occur. As described above wet soil conditions are clues to the presence of hydric soils.

MAPPING POTENTIAL WETLANDS

The combined resources listed above were used to conservatively indicate the location of what were broadly termed 'potential wetlands', and/or 'likely' wetland (Table 1). These areas were conservatively mapped.

[1] Retrolens and licenced by LINZ CC By 3.0

[2] S- Maps soil classification soil order 2022)

Table 1: Basis for the determination of potential wetlands identified within growth cells.

'Potential wetlands'	'Likely'
-Low likelihood of wetland -Vegetation more likely than not present (Visual appearance relative to surrounding vegetation, colour, shape) OR -Presence of hydric soils, visible surface water, landscape position	-Moderate likelihood of wetland -Vegetation more likely than not present (Visual appearance relative to surrounding vegetation, colour, shape) AND -Presence of hydric soils, visible surface water, landscape position

REFERENCES

Clarkson, B. (2014) A vegetation tool for wetland delineation in New Zealand. Landcare Research

Fraser, S., Singleton, P., and Clarkson, B. (2018) Hydric soils – field identification guide. Manaaki Whenua - Landcare Research. Retrieved from: https://www.envirolink.govt.nz/assets/R13-5-Hydric-soils-field-identification-guide.pdf

Hewitt, A.E. (2011) New Zealand Soil Classification. Manaaki Whenua - Landcare Research Science Series No. 1. 3rd edition Retrieved from: http://digitallibrary.landcareresearch.co.nz/digital/collection/p20022coll1/id/268

Ministry for the Environment. 2020. Wetland delineation protocols. Wellington: Ministry for the Environment. Retrieved from: https://environment.govt.nz/assets/Publications/Files/wetland-delineation-protocols.pdf

Ministry for the Environment. 2021. Wetland delineation hydrology tool for Aotearoa New Zealand. Wellington: Ministry for the Environment. Retrieved from: https://environment.govt.nz/assets/publications/wetland-hydrology-tool-final.pdf

Regional Policy Statement – Built Environment

Provision		Assessment
3.12	Built environment	
	Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:	
	a) promoting positive indigenous biodiversity outcomes;	See assessment under Appendix 6A General Development Principles k) and l)
	b) preserving and protecting natural character, and protecting outstanding natural features and landscapes from inappropriate subdivision, use, and development;	See assessment under Appendix 6A General Development Principles j)
	c) integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors;	See assessment under Policy 6.6
	d) integrating land use and water planning, including to ensure that sufficient water is available to support future planned growth;	See assessment under Policy 6.3 Appendix 6A and General Development Principles d), e), n)
	e) recognising and protecting the value and long-term benefits of regionally significant infrastructure;	See assessment under Policy 6.6
	f) protecting access to identified significant mineral resources;	See assessment under Policy 6.6 and General Development Principles h)
	g) minimising land use conflicts, including minimising potential for reverse sensitivity;	See assessment under Policy 6.6 and General Development Principles b), o)
	h) anticipating and responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region;	No conflict

Provision		Assessment
	i) providing for the development, operation, maintenance and upgrading of new and existing electricity transmission and renewable electricity generation activities including small and community scale generation;	No conflict
	j) promoting a viable and vibrant central business district in Hamilton city, with a supporting network of sub-regional and town centres; and	See Assessment under Policy 6.16
	k) providing for a range of commercial development to support the social and economic wellbeing of the region.	See Assessment under Policy 6.16 g) and General Development Principles i)
Policy 6.1	Planned and co-ordinated subdivision, use and development	
	Subdivision, use and development of the built environment, including transport, occurs in a planned and co-ordinated manner which:	
	a) has regard to the principles in section 6A;	This assessment has had regard to the general development principles in section 6A.
	b) recognises and addresses potential cumulative effects of subdivision, use and development;	As an area of significant growth, the assessment considers cumulative effects of for a defined Development Area.
	c) is based on sufficient information to allow assessment of the potential long-term effects of subdivision, use and development; and	A Structure Plan has been developed with sufficient information based on expert input to inform the assessment. The information meets or exceeds the level of information used for the planning of other growth areas.
	d) has regard to the existing built environment	The Structure Plan has been informed by a site analysis that includes consideration of the existing built environment.
Policy 6.3	Co-ordinating growth and infrastructure	
	Management of the built environment ensures:	
	a) the nature, timing and sequencing of new development is co-ordinated with the development, funding, implementation and operation of transport and other infrastructure, in order to:	The Growth Cell area and associated Structure Plan rely on the upgrading of existing roading and three waters infrastructure.

Provision		Assessment
	i) optimise the efficient and affordable provision of both the development and the infrastructure; ii) maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure; iii) protect investment in existing infrastructure; and iv) ensure new development does not occur until provision for appropriate infrastructure necessary to service the development is in place;	These upgrades are set out in the Integrated Transportation Assessment, Wastewater Servicing Assessment, Water Servicing Assessment and the Stormwater Masterplanning assessment. The upgrade costs will be covered by the developer.
	b) the spatial pattern of land use development, as it is likely to develop over at least a 30-year period, is understood sufficiently to inform reviews of the Regional Land Transport Plan. As a minimum, this will require the development and maintenance of growth strategies where strong population growth is anticipated;	It is appropriate to ensure that transport infrastructure is futureproofed to allow for the Growth Cell, which will become part of the Te Awamutu urban environment as part of this Plan Change. The policy will be better met by including the Growth Cell in the settlement strategy and transport planning.
	c) the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained; and	The Growth Cell does not require the provision of additional transport infrastructure other than that to allow access to and from the site. Its location near places of employment can mitigate effects on the transport network by more efficiently distributing trips. The Growth Cell has the potential to be fully integrated with current and future transportation networks. The Development Area can be integrated with known expected settlement patterns and can provide a high level of multi-modal connectivity with the same, without being dependent on their delivery. An Integrated Transport Assessment (ITS) has been prepared and is attached to the plan change request as an appendix.
	d) a co-ordinated and integrated approach across regional and district boundaries and between agencies; and	The Development Area has been assessed based on functional coordination and integration, rather than administrative relationships.

Provision		Assessment
	e) that where new infrastructure is provided by the private sector, it does not compromise the function of existing, or the planned provision of, infrastructure provided by central, regional and local government agencies.	The infrastructure associated with the Growth Cell will not compromise the public provision of infrastructure. Inclusion of the Growth Cell will improve the viability of planned infrastructure provision (return on investment) through increased scale, density and more timely delivery of housing development.
Policy 6.5	Energy demand management	
	Development should minimise transport, energy demand and waste production, encourage beneficial re-use of waste materials, and promote the efficient use of energy.	The Structure Plan includes compact energy efficient urban form, and design and location which follows these principles. The development will minimise energy and carbon use through compact urban form and multi modal transportation network, including public transport routes. Working opportunities within the Development Area are limited to the commercial use centre and working from home, but the area is close by large employment areas in Te Awamutu.
Policy 6.6	Significant infrastructure and energy resources	
	Management of the built environment ensures particular regard is given to:	
	a) that the effectiveness and efficiency of existing and planned regionally significant infrastructure is protected;	Existing and planned regionally significant infrastructure will not be affected by the development. The function of the adjacent strategic road will be protected from reserve sensitivity effects by buffering open space, as well as site specific mitigation where necessary. An access point to State highway 3 is provided for as set out in the ITA.

Provision		Assessment
	b) the benefits that can be gained from the development and use of regionally significant infrastructure and energy resources, recognising and providing for the particular benefits of renewable electricity generation, electricity transmission, and municipal water supply; and	The Development Area will not impede the development and use of regionally significant infrastructure and energy resources.
	c) the locational and technical practicalities associated with renewable electricity generation and the technical and operational requirements of the electricity transmission network.	No conflict
Policy 6.8	Access to minerals	No conflict
Policy 6.9	Information collection	No conflict
Policy 6.13	Governance collaboration in the Future Proof area	No conflict
Policy 6.14	Adopting Future Proof land use pattern	
	Within the Future Proof area:	
	a) new urban development within Hamilton City, Cambridge, Te Awamutu/Kihikihi, Pirongia, Huntly, Ngaruawahia, Raglan, Te Kauwhata, Meremere, Taupiri, Horotiu, Matangi, Gordonton, Rukuhia, Te Kowhai and Whatawhata shall occur within the Urban Limits indicated on Map 6.2 (section 6C);	The purpose of this plan change request is to change the urban limits and include the proposed growth cell within the Te Awamutu Urban Limits.
	b) new residential (including rural-residential) development shall be managed in accordance with the timing and population for growth areas in Table 6-1 (section 6D);	
	c) new industrial development should predominantly be located in the strategic industrial nodes in Table 6-2 (section 6D) and in accordance with the indicative timings in that table except where alternative land	No conflict

Provision		Assessment
	release and timing is demonstrated to meet the criteria in Method 6.14.3;	
	d) other industrial development should only occur within the Urban Limits indicated on Map 6.2 (section 6C), unless there is a need for the industry to locate in the rural area in close proximity to the primary product source. Industrial development in urban areas other than the strategic industrial nodes in Table 6-2 (section 6D) shall be provided for as appropriate in district plans; plans;	No conflict
	e) new industrial development outside the strategic industrial nodes or outside the allocation limits set out in Table 6-2 shall not be of a scale or location where the development undermines the role of any strategic industrial node as set out in Table 6-2;	No conflict
	f) new industrial development outside the strategic industrial nodes must avoid, remedy or mitigate adverse effects on the arterial function of the road network, and on other infrastructure;	No conflict
	g) where alternative industrial and residential land release patterns are promoted through district plan and structure plan processes, justification shall be provided to demonstrate consistency with the principles of the Future Proof land use pattern; and	A separate assessment against the Future Proof out of sequence and unanticipated developments criteria has been undertaken and is attached as an appendix to the plan change request.
	h) where land is required for activities that require direct access to Hamilton Airport runways and where these activities cannot be accommodated within the industrial land allocation in Table 6-2, such activities may be provided for within other land adjacent to the runways, providing adverse effects on the arterial road network and other infrastructure are avoided, remedied or mitigated.	No conflict
Policy 6.15	Density targets for Future Proof area	

Provision		Assessment
	Hamilton City Council, Waipa District Council and Waikato District Council shall seek to achieve compact urban environments that support existing commercial centres, multi-modal transport options, and allow people to live, work and play within their local area. In doing so, development provisions shall seek to achieve over time the following average gross density targets: … Greenfield development in Cambridge, Te Awamutu/Kihikihi, Huntly, Ngaruawahia, Raglan/Whaingaroa and Te Kauwhata – 12-15 houses per hectare …	Average gross density is not defined in the RPS. Gross density is assumed to mean the total number of dwelling units divided by the total project area, without subtracting areas devoted to open space, roadways, parks or similar public use and infrastructure areas. The average gross density of the Development Area, excluding the commercial area, and undevelopable land set aside for ecological protection and stormwater management, is at least 20 lots/ha.
Policy 6.16	Commercial development in the Future Proof area	
	Management of the built environment in the Future Proof area shall provide for varying levels of commercial development to meet the wider community's social and economic needs, primarily through the encouragement and consolidation of such activities in existing commercial centres , and predominantly in those centres identified in Table 6-4 (section 6D). Commercial development is to be managed to:	
	a) support and sustain the vitality and viability of existing commercial centres identified in Table 6-4 (section 6D);	The policy relates primarily to Town Centres, Subregional Centres and CBD and does not address local and neighbourhood centres. The small commercial use centre shown in the structure plan is consistent with this policy. It provides only a local convenience service function, aimed at reducing travel and promoting walking and cycling to local services.
	b) support and sustain existing physical resources, and ensure the continuing ability to make efficient use of, and undertake long-term planning and management for the transport network, and other	The proposed commercial use centre for the Growth Cell will not have an adverse impact on Town Centres, Subregional Centres and CBD and will serve to reduce external trips on the road network.

Provision		Assessment
	public and private infrastructure resources including community facilities;	
	c) recognise, maintain and enhance the Hamilton Central Business District as the primary commercial, civic and social centre of the Future Proof area, by: i) encouraging the greatest diversity, scale and intensity of activities in the Hamilton Central Business District; ii) managing development within areas outside the Central Business District to avoid adverse effects on the function, vitality or amenity of the Central Business District beyond those effects ordinarily associated with trade competition on trade competitors; and iii) encouraging and supporting the enhancement of amenity values, particularly in areas where pedestrian activity is concentrated.	No conflict
	d) recognise that in addition to retail activity, the Hamilton Central Business District and town centres outside Hamilton are also centres of administration, office and civic activity. These activities will not occur to any significant extent in Hamilton outside the Central Business District in order to maintain and enhance the Hamilton Central Business District as the primary commercial, civic and social centre;	No conflict
	e) recognise, maintain and enhance the function of sub-regional commercial centres by: i) maintaining and enhancing their role as centres primarily for retail activity; and ii) recognising that the sub-regional centres have limited non-retail economic and social activities;	No conflict.

Provision		Assessment
	f) maintain industrially zoned land for industrial activities unless it is ancillary to those industrial activities, while also recognising that specific types of commercial development may be appropriately located in industrially zoned land; and	No conflict
	g) ensure new commercial centres are only developed where they are consistent with a) to f) of this policy. New centres will avoid adverse effects, both individually and cumulatively on: i) the distribution, function and infrastructure associated with those centres identified in Table 6-4 (section 6D); ii) people and communities who rely on those centres identified in Table 6-4 (section 6D) for their social and economic wellbeing, and require ease of access to such centres by a variety of transport modes; iii) the efficiency, safety and function of the transportation network; and iv) the extent and character of industrial land and associated physical resources, including through the avoidance of reverse sensitivity effects.	The commercial use centre shown on the Structure Plan is consistent with a) to f) of the policy. There will be negligible distribution, function and infrastructure on the existing network of centres.
Policy 6.17	Rural-residential development in Future Proof area	No conflict
Policy 6.18	Monitoring development in Future Proof area	No conflict
Policy 6.19	Review of Future Proof map and table	Proposed to be updates as part of this plan change.
Appendix 6A	General development principles New development should:	

Provision		Assessment
	a. support existing urban areas and development nodes in preference to creating new ones;	The Growth Cell area supports and builds on existing urban areas in Te Awamutu North, providing easy access to places of employment, and community and commercial services.
	b. occur in a manner that provides clear delineation between urban areas and rural areas	The proposed ecological areas and landscape buffers in the Structure Plan frame the existing rural edges of the Development Area providing a clear delineation between urban areas and rural areas;
	c. make use of opportunities for urban intensification and redevelopment to minimise the need for urban development in greenfield areas;	The shortfall of accessible and ready to develop land has been clearly set out in the economic assessment. While the Growth Cell is a greenfield development area, the development will be at densities that minimise land requirements. The urban design approach embeds higher housing density typologies and provides appropriate levels of accessible local services and open space with high levels of connectivity.
	d. not compromise the safe, efficient, and effective operation and use of existing infrastructure, including transport infrastructure, and should allow for future infrastructure needs, including maintenance and upgrading, where these can be anticipated;	The Development Area has the potential to be fully integrated with current and future transportation networks. The design and operation of all three waters will be incorporated using a Stormwater masterplan approach. The Growth Cell has potential to fully manage both stormwater quantity and quality within its boundaries without additional infrastructure extensions in accordance with best management practices. Extension of existing water and wastewater infrastructure will be required to service the development. Wastewater and Water Servicing Assessments have confirmed that there is capacity for the Growth Cell to be serviced for wastewater and water supply.
	e. connect well with existing and planned development and infrastructure;	The Growth Cell can be integrated with known expected settlement patterns and can provide a high level of multimodal connectivity.

Provision		Assessment
	f. identify water requirements necessary to support development and ensure the availability of the volumes required;	The Growth Cell will require infrastructure upgrades from outside of the development, particularly water and wastewater, but based on the modelling undertaken there is sufficient capacity to deal with the development. Modelling is included in the plan change request document.
	g. be planned and designed to achieve the efficient use of water;	
	h. be directed away from identified significant mineral resources and their access routes, natural hazard areas, energy transmission corridors, locations identified as likely renewable energy generation sites, and high class soils;	There are no significant mineral resources and their access routes, natural hazard areas, energy transmission corridors, locations identified as likely renewable energy generation sites, or natural hazards on the site. The growth cell site contains sections of high class soils. The National Policy Statement for the Protection of Highly Productive Land came out in 2022. An assessment against the provisions of this legislation are included as part of this plan change request and it is concluded that the proposed development on highly productive land is acceptable.
	i. promote compact urban form, design and location to: i) minimise energy and carbon use; ii) minimise the need for private motor vehicle use; iii) maximise opportunities to support and take advantage of public transport in particular by encouraging employment activities in locations that are or can in the future be served efficiently by public transport; iv) encourage walking, cycling and multi-modal transport connections; and v) maximise opportunities for people to live, work and play within their local area;	The Structure Plan includes provisions for compact urban form, and design and location which closely follows these principles. While working opportunities with the Structure Plan are principally aligned to: • the construction component of the development; • businesses in the small commercial use centre ; • Use of walking, biking and public transport The site also has good accessibility and connections with Te Awamutu Township and sits on a public transport route to Hamilton.

Provision		Assessment
	j. maintain or enhance landscape values and provide for the protection of historic and cultural heritage from inappropriate subdivision, use and development;	There is a listed SNA within the site. Provisions through the Structure Plan and the waterways protection and enhancement plan seek to protect, enhance and utilise the SNA as a feature. There are no other recorded sites of landscape, cultural or heritage significance within the site.
	k. promote positive indigenous biodiversity outcomes and protect significant indigenous vegetation and significant habitats of indigenous fauna. Development which can enhance ecological integrity, such as by improving the maintenance, enhancement, or development of ecological corridors, should be encouraged;	An Ecological Impact assessment has been undertaken and identifies watercourses as a modified stream. The habitat value of the watercourses is currently very low. A number of natural wetlands have been identified. Provision around the protection and enhancement of these has been included in the Structure Plan and the waterways protection and enhancement plan. The proposed Stormwater Management offers further opportunity to enhance indigenous biodiversity around and within the Development Area. The State Highway buffer also provides scope for development of an ecological corridor connected to the Stormwater Management Area, linking through to the school and other open spaces.
	l. maintain or enhance public access to and along the coastal marine area, lakes, and rivers;	The Structure Plan includes access along the existing waterway on site.
	m. avoid as far as practicable adverse effects on natural hydrological characteristics and processes (including aquifer recharge and flooding patterns), soil stability, water quality and aquatic ecosystems, including through low impact design methods where appropriate;	The Development Area will manage stormwater so that it is maintained to a predevelopment rate. Consenting of stormwater discharge will happen at the next development stage. This policy will be further addressed at that stage.
	n. adopt, where appropriate, sustainable design technologies such as the incorporation of energy-efficient (including passive solar) design, low-energy street lighting, rain gardens,	There is no impediment to sustainable design technologies being adopted in the development.

Provision		Assessment
	renewable energy technologies, rainwater harvesting and grey water recycling techniques;	Low impact design practices will be adopted in stormwater design as set out in the stormwater masterplanning assessment.
	o. not result in incompatible adjacent land uses, such as with respect to industry, rural activities and existing or planned infrastructure;	The Structure Plan has buffering between the residential areas and adjacent rural land uses and the State Highway.
	p. be appropriate with respect to expected effects of climate change and be designed to allow adaptation to these changes;	As outlined above, the development will minimise energy and carbon use through compact urban form and multi modal transportation network. The stormwater management system will has taken into account climate change factors in its design.
	q. consider effects on the unique tangata whenua relationships, values, aspirations, roles, and responsibilities with respect to an area. Where appropriate, opportunities to visually recognise tangata whenua connections within an area should be considered;	Recognition of cultural identity will be achieved through placemaking elements including view lines to maunga, open space and road names and the restoration and enhancement of natural values and the mauri of the stream network. The structure plan has been developed using the Te Aranga Design Principles.
	r. support the Vision and Strategy for the Waikato River and the Waikato River catchment;	An assessment against the Vision and Strategy has been included as part of the plan change request and concludes that the proposed plan change is consistent with it.
	s. encourage waste minimisation and efficient use of resources (such as through resource-efficient design and construction methods); and	There is no impediment to waste minimisation and efficient use of resources being adopted in the development.
	t. avoid adverse effects on ecosystem services.	The main ecosystem services exist within the existing waterway that traverses the Growth Cell area. The Stream is already highly modified and in a degraded state. The habitat value of the watercourses is currently very low. The waterways protection and enhancement plan seek to protect, enhance and utilise the waterway, wetlands and the SNA as part of the development.

Waikato Tainui Environmental Management Plan–Tai Tumu Tai Pari Tai Ao assessment:

Environmental Management Plan Chapter	Assessment
Te Wai Maori –Fresh Water	The proposal includes a Stormwater Masterplan and associated Waterways Protection and Enhancement Plan. These plans set out how the existing waterways on site will be protected and enhances as part to the proposed structure plan and stormwater management. The documents ensure a better outcome for the exiting waterways on site.
Ngaa Repo – Wetlands	There are a number of identified wetlands on the site. Part of the proposal includes the protection and enhancement of these wetlands as set out in the Waterways Protection and Enhancement Plan. Consents under the NES Freshwater will be applied for with WRC and will include further detail regarding the protection and enhancement of wetlands.
Whenua – Land	The site is currently farmed. Development will retire land from dairying and provide an opportunity to enhance the site through planting and the management of stormwater. All development will be managed by best practice erosion and sediment control measures. There is minimal contamination on the site and this will be managed or removed using best practice.
He Mahinga Ika – Fisheries	As set out above, the Stormwater Masterplan and associated Waterways Protection and Enhancement Plan have been developed to ensure the protection and enhancement of the watercourse on site. Consents for physical works will occur at a separate stage but will include provision for the protection of species during physical works.
Te Ararangi – Air	There is potential for dust discharges during construction. These will be managed through resource consent conditions
Ngaa Whakaritenga Moo Ngaa Whenua O Waikato-Tainui – Land Use Planning	The overall development of the site will provide opportunities for environmental enhancement, particularly within the proposed open space network and stormwater treatment and wetland and SNA protection, enhancement and utilisation. It has land use planning benefits by increasing the range of housing opportunities.
Waihanga Matua–Infrastructure	The Growth Cell and structure plan include the provision of infrastructure. There is adequate capacity to service the development with the implementation of the proposed upgrades.

Assessment – Vision and Strategy for the Waikato River

Provision		Assessment
Objective a.	The restoration and protection of the health and wellbeing of the Waikato River	The private plan change area/proposed growth cell is within the catchment of the Waipa and Waikato Rivers. The protection and enhancement of identified wetlands on site have been factored into the development of the structure plan, consistent with the Vision and Strategy. Further to this, the proposal includes a Riparian and Waterways Protection and Enhancement Plan. This plan includes the following notable features and restoration objectives: *Riparian and wetland planting, Stream naturalisation (stream channel profiles), Creation of fish spawning habitat , Provision of fish passage in four new culverts, Formation of instream habitat features such as pools.* Future consents will be sought for the physical development of the land and associated discharges. The Vision and Strategy will need to be further addressed as part of these applications. Discharge of stormwater will be dealt with through a comprehensive stormwater management plan. This will form part of a resource consent application to Waikato Regional Council which will further address the provisions of the Vision and Strategy for the Waikato River. When considering the proposed plan change in a Land Use context, the change of land use from its current rural use as a dry stock farm to residential, any runoff of nutrients associated with the farming practice would no longer occur. Discharges associated with the land development will be addressed through activity specific consent applications and subsequent assessments of the Vision and Strategy.
Objective g.	The recognition and avoidance of adverse cumulative effects, and potential cumulative effects, of activities undertaken both on the Waikato River and within its catchments on the health and wellbeing of the Waikato River.	
Strategy 1.	Ensure that the highest level of recognition is given to the restoration and protection of the Waikato River	
Strategy 6.	Recognise and protect waahi tapu and sites of significance to Waikato-Tainui and other Waikato River iwi (where they so decide) to promote their cultural, spiritual and historic relationship with the Waikato River	There are no known or identified waahi tapu sites within the vicinity of the site.
Strategy 9.	Encourage and foster a 'whole of river' approach to the restoration and protection of the Waikato River, including the development, recognition and promotion of best	See above assessment against Objective a, Objective g and Strategy 1.

	practice methods for restoring and protecting the health and wellbeing of the Waikato River.	
Strategy 11.	Ensure that cumulative adverse effects on the Waikato River of activities are appropriately managed in statutory planning documents at the time of their review.	