

Future Proof Implementation Committee c/o Ken Tremaine
14 Spencer St
Remuera
AUCKLAND 1050

28 February 2011

Chief Executive Attn: Policy Group Environment Waikato PO Box 4010 HAMILTON EAST

BY EMAIL TO: rps@ew.govt.nz

Dear Sir,

FUTURE PROOF IMPLEMENTATION COMMITTEE SUBMISSION TO THE PROPOSED WAIKATO REGIONAL POLICY STATEMENT (November 2010)

This is a submission by the Future Proof Implementation Committee ("FPIC") in **support** of the *Proposed Waikato Regional Policy Statement* ("Proposed RPS") notified on 3 November 2010.

The FPIC is the implementation arm of the Future Proof Growth Strategy ("Future Proof" or "Strategy"). The FPIC includes representatives from the Hamilton City Council ("HCC"), the Waipa District Council ("Waipa DC"), the Waikato District Council ("Waikato DC"), the Waikato Regional Council (Environment Waikato), and tāngata whenua (Waikato-Tainui). As the administering authority for the Proposed RPS, Environment Waikato has abstained from forming a part of this submission. The Future Proof partners may still make individual submissions.

The FPIC strongly supports the implementation of key aspects of the Future Proof Strategy and settlement pattern in the Proposed RPS particularly at *Chapter 6 Built Environment*. It is a priority action for Strategy implementation to give statutory effect in the Regional Policy Statement to the Future Proof settlement pattern and the establishment of urban limits. The Regional Policy Statement is the key implementation tool giving statutory effect to the Future Proof Strategy and principles.

The FPIC respectfully requests that the Regional Council is mindful of a number of general considerations when assessing the feedback to the Proposed RPS and have set out a number of general comments in this submission for the Regional Council's consideration. The FPIC has also made a number of more specific submissions regarding the Proposed RPS document. These matters are reiterated in the FPIC submission; the content of which follows overleaf.

The FPIC is willing to appear in support of its submission. If others make a similar submission the FPIC would also be prepared to consider presenting a joint case with them at the submissions hearing.

Yours sincerely,

Consellaine.

Ken Tremaine

Future Proof Implementation Advisor

A. General Comments

The Future Proof partners strongly commend Environment Waikato on the Proposed RPS which implements key aspects of the Future Proof Strategy, its key principles, and priority actions with regard to the implementation of the sub-regional settlement pattern and the establishment of urban limits.

Given the importance of the Proposed RPS document to implementing Future Proof, the FPIC request that the Regional Council consider the following matters in their assessment of the submissions they receive. These matters are of importance to Future Proof Strategy implementation.

Industrial Land

The FPIC supports the inclusion in the Proposed RPS of provisions pertaining to the allocation and timing of industrial land in the Future Proof area. Industrial land is one of the most challenging areas to address.

In this submission, changes are recommended to the industrial land policies and Table 6-2 to account for:

- The findings of the North Waikato Strategic Industrial Node Study;
- Further work undertaken on the Ruakura Estate which was not available when the Proposed RPS was notified:
- The release of the draft Waipa District Plan review, including its aims around balancing commercial and industrial land;
- The desire to have all Industrial Strategic Nodes identified and their quantum included so that changes do not have to be made to the Regional Policy Statement ("RPS") in a relatively short time after it has been made operative;
- The need to ensure that we have certainty around the land use pattern as this is essential from an integrated planning perspective. Integrating infrastructure with land use is also a Regional Council function under section 30(1)(gb) of the Resource Management Act 1991 ("RMA 1991");
- The need to have land use certainty for Waikato Expressway implementation, particularly for the location and design of interchanges.

Further details on these are set out in submission points 40 and 41 in Part B of this submission.

Flexibility

The Future Proof partners consider that the Proposed RPS is flexible enough and that the right balance has been struck between the policies needed to implement Future Proof and the ability to be able to make changes to the Future Proof settlement pattern for example, when necessary and/or agreed. Footnotes are proposed to Table 6-2 and a proposed new Table 6-2(a) to provide some flexibility around the staging of strategic industrial nodes. See submission points 40 and 41.

Consistency with the Regional Land Transport Strategy

As the overarching document setting the strategic direction for the management of natural and physical resources and land use in particular, it is important that the Regional Policy Statement is consistent with the Regional Land Transport Strategy ("RLTS") which sets the region's land transport direction.

It is clear that the Proposed RPS document is consistent with the operative RLTS and the recently notified draft RLTS given that the Proposed RPS makes references to:

- ensuring a spatial pattern of land use development that is understood sufficiently to inform reviews of the RLTS:
- the Regional Council through its RLTS, investigating opportunities to improve public transport and to its promote its benefits and uptake.

The FPIC supports this alignment between the Proposed RPS and RLTS documents.

Airport

The FPIC also requests that where relevant the Proposed RPS should ensure that the Airport continues to be protected from reverse sensitivity effects through controls to avoid the establishment of new activities which would be adversely affected by airport noise and operational effects (particularly residential and rural-residential activities). The Future Proof Strategy recognises the Hamilton International Airport as a significant regional asset and the FPIC supports that in the Glossary of the Proposed RPS the Hamilton International Airport is listed as regionally significant infrastructure.

Rural Residential Policies

Given the intense patterns of rural residential development around the region, and particularly in areas under high population and development growth pressures such as in the Future Proof area, it is important that the policies and implementation methods under Policy 6.16 and chapter 6A of the Proposed RPS are strong enough to manage them.

Intensification

Recently the Future Proof partners finalised work on an 'Intensification Toolkit' for the Future Proof area. The provisions in the Proposed RPS on densities and the advocacy of densities, are consistent with the findings in the Intensification Toolkit with regard to the Regional Policy Statement.

Therefore the FPIC strongly supports Policy 6.14 on Density targets for the Future Proof area and the average gross density targets for the various locations set out. These align with provisions in the Future Proof Strategy. These density targets give Territorial Authorities in the Future Proof area a stronger mandate to implement the growth targets in their planning documents.

Population

It is acknowledged that the population figures used in Table 6-1 will need to be revisited once the results of the next Census become available. Table 6-1 is based on population figures used in the Future Proof Strategy which was launched in September 2009. The model used to inform the figures in the Strategy did not take into account the growth within the former Franklin District given that boundary changes affecting the Waikato District only came into legal effect on 1 November 2010.

It is also likely that the Global Financial Crisis (GFC) of 2007-2010 would have had an impact on the timing of population distribution within the Future Proof sub-region.

Specific submissions follow overleaf.

B. Specific Comments

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
1.	Introduction, pages i -v.	Support	The FPIC supports the reference to plans and strategies prepared under other Acts such as the Local Government Act 2002 ("LGA 2002") and Land Transport Management Act 2003 ("LTMA 2003") being relevant to resource management; and able to contribute to achieving regional policy statement objectives and policies. Future Proof has been developed within the broad context of the LGA 2002 and takes a strategic, integrated approach to long term planning and growth management in the sub-region's areas of Hamilton City, Waipa and Waikato Districts. It is therefore directly relevant to resource management in the Waikato region, and contributes to achieving regional policy statement objectives and policies.	Retain.
2.	Issue 1.4 Managing the built environment and Explanation, pages 1-4 - 1-5.	Support	 This issue and its explanation is generally supported given its: Acknowledgement that the development of the built environment, transport, and other infrastructure is impacting on abilities to sustainably manage natural and physical resources and the provision of wellbeing; and Intention to focus this issue on matters particularly relating to: High development pressure around Hamilton City, Waipa and Waikato Districts, Lake Taupo, and along the Waikato River in the coastal environment; and Increasing conflict with and demands for infrastructure; Reference to the region's productive soils being compromised by widespread rural residential development and the need to carefully manage the built environment; Support for strategic planning for development in high growth areas. 	Retain.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			The Future Proof Strategy recognises all of these aspects to this issue and makes similar provisions and actions to address them. The key action being the incorporation of the Future Proof settlement pattern and establishment of urban limits into the Proposed RPS to help manage these issues over the long term for the benefit of everyone living, working, or having recreation in the Waikato region.	
3.	Issue 1.5 Relationship of tāngata whenua with the environment (te taiao) and Explanation, pages 1-5 – 1-6.	Support	The FPIC generally supports this issue and explanation as it aligns with provisions in the Future Proof Strategy (particularly in 8.33 of the Strategy) which acknowledges the intimate knowledge that tāngata whenua have of the region's natural resources as 'kaitiaki' or caretakers.	Retain.
4.	Issue 1.6 Health and wellbeing of the Waikato River and Explanation, pages 1-6 – 1-7.	Support	The FPIC acknowledges and supports this issue and its explanation that the relationship of the Waikato River lwi with the Waikato River is at the heart of their well being and identity. The FPIC also supports that the Proposed RPS recognises that the Waikato river is degraded and contains provisions aimed at restoring the river's health as a priority. Future Proof recognises the need to protect and restore the Waikato River and to balance its competing uses and values. The Strategy also acknowledges that the recently enacted Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 will impact this as this legislation establishes the Waikato River Authority and any matters concerning the Waikato River or its tributaries will need to go through it.	Retain.
5.	NEW <u>Issue 1.7</u> <u>Enabling People to provide for their</u>	Support	The stated issues set the scene for a policy framework that deals with the environmental bottom lines specified in the latter part of section 5 of the RMA 1991. What is absent, however, is an issue that deals with the first part of section 5, being	Add a new Issue 1.7 as requested (or similar) to affirm the first part of section 5 of the

Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
wellbeing, and		the enabling of people to provide for their wellbeing.	RMA 1991 on enabling people to
Explanation.		We therefore propose to include an issue statement in section 1 of the Proposed RPS to affirm the first part of section 5 of the RMA 1991. This issue can then be used as a base for objectives and policies which enable and support resource use. In the absence of such an issue, the Proposed RPS document appears to consider resource use as a problem to be constrained, rather than something which can be positive provided that any adverse effects are properly managed. The following (or similar) is requested:	provide for their wellbeing. Also add the associated Explanation as requested (or similar).
		Issue 1.7 Enabling people to provide for their wellbeing	
		Failure to enable people to access resources at reasonable cost will hinder their ability to provide for their wellbeing.	
		The FPIC also requests that the following new explanation accompany the inclusion of new Issue 1.7:	
		<u>Explanation</u>	
		It is integral to sustainable management to confirm the importance of enabling people to use resources to provide for their social, cultural and economic wellbeing. It is acknowledged that attaining social, cultural and economic goals may result in adverse effects on natural and physical resources and therefore the Regional Policy Statement seeks to provide a policy framework which enables competing aspirations to be assessed and resource management decisions to be made.	
		It is also acknowledged that if an activity changes the physical environment it does not necessarily mean that the activity is unsustainable; the sustainability of an activity is measured according to the ability of the environment to continue to	

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			function in some altered but acceptable state.	
6.	Objective 3.1 Integrated management, page 3-1.	Support	 The objective of integrated management is strongly supported given it: Addresses issues of managing the built environment, the relationship of tangata whenua with the environment, health and wellbeing of the Waikato River Is intended to be achieved through policies on integrated approach, collaborative approach, tangata whenua, planned and coordinated development, and governance collaboration in the Future Proof area. This objective strongly aligns with Future Provisions on development generally, tangata whenua and cultural considerations, Waikato River issues, integrated planning, and collaboration. 	Retain.
7.	NEW Objective 3.2 (n), Decision making, pages 3-1 – 3-2.	Support	The decision making objective in section 3.2 of the Proposed RPS (clauses (a) through to (m)) is generally supported given its references to: Alignment across legislation as well as national and regional strategies; and Taking an integrated approach to managing resources which are across a number of regional and functional boundaries. As a whole, objective 3.2 aligns with the Future Proof integrated planning approach as well as priority actions for Strategy implementation. Objective 3.2 contains a number of important statements including the need for integration, and the time that may be needed for change to occur. However it does not refer directly to the positive outcomes associated with resource use. It is therefore proposed that a new statement '(n)' be added to the current list of objectives to do so, and the following wording is requested (or similar):	Add a new statement '(n)' to objective 3.2 as requested (or similar) to account for the positive outcomes associated with resource use.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			3.2 Decision making Resource management decision making is holistic and consistent and: (n) takes into account the positive social, cultural and economic outcomes associated with resource use.	
8.	Objective 3.11 Built environment, page 3-7.	Support	 Objective 3.11 is supported given its references to: Integrating land use and infrastructure planning Recognising the value and long term benefits of regionally significant infrastructure; Protecting regionally significant transport and energy corridors; Minimizing land use conflicts including minimising potential for reverse sensitivity with existing land uses. This objective aligns with a number of Future Proof guiding principles which are the fundamental principles of the Strategy's content and implementation. 	Retain.
9.	Policy 4.1 Integrated management, Implementation method 4.1.2, and Explanation, page 4-1.	Support in part	On the whole, Policy 4.1 on Integrated Management, its implementation methods and Explanation (from pages 4-1 to 4-5 of the Proposed RPS) are generally supported given their references to: Land use change; A coordinated approach; Plans and strategies; Advocacy and education; Planning approach; Other plans and strategies; and Monitoring/information gathering.	Make the proposed addition to Implementation Method 4.1.2 to assist Territorial Authorities with growth strategies in recognition of the major planning role that the Regional Council has.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			These provisions align with Future Proof guiding principles and priority actions. The adoption of an integrated approach to resource management is a strategic approach which recognises and can accommodate the changing environment and changing resource use pressures and trends. Given that the Future Proof subregion (Hamilton City, Waipa and Waikato Districts) in particular is experiencing significant and rapid population and development growth and related pressures, the FPIC agrees that this policy approach would assist in the management of these pressures.	
			The FPIC also acknowledges that the Regional Council has a major planning role through: providing a regional perspective through the key regional documents: the RPS and the RLTS; promoting a co-ordinated approach between territorial authorities; and ensuring regionally significant infrastructure is properly managed. Therefore an amendment is proposed to Implementation Method 4.1.2 as follows to recognise the major planning role that the Regional Council has: Add the following to Implementation Method 4.1.2: (e) assisting Territorial Authorities to develop growth strategies.	
10.	Policy 4.2 Collaborative approach, Implementation methods and Explanation, pages 4-6 – 4-8.	Support	This policy, its implementation methods and explanation are generally supported. They align with Future Proof's approach on collaboration. The Strategy's development and implementation is a collaborative effort between its partners. Implementation methods of particular note from a Future Proof implementation perspective include: Coordinated approaches to resource management;	Retain.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			 Recognition of interests; Consistent information systems; Joint planning; Inter-agency liaison; and General and specific cross boundary issues. 	
11.	Policy 4.3 Tāngata Whenua, Implementation methods and Explanation, pages 4-9 – 4-10.	Support	Policy 4.3, its implementation methods and explanation are generally supported. They align with Future Proof guiding principles and provisions (particularly in 8.33 of the Strategy) on tāngata whenua. The FPIC is particularly supportive of implementation methods which: Seek to develop strategic partnerships with iwi authorities; Ensure opportunities for tāngata whenua involvement; Provide for Kaitiakitanga; Promote tāngata whenua wellbeing by enabling them to have appropriate access, use, and enjoyment of their resources.	Retain.
12.	Part B, 6 Built Environment, (Whole Chapter) pages 6-1 – 6-22.	Support	The FPIC strongly supports the 6 Built Environment chapter of the Proposed RPS. This chapter is the key means of giving statutory effect to the Future Proof Strategy and in particular the Future Proof the settlement pattern and the implementation of urban limits.	Retain.
13.	Policy 6.1 Planned co-ordinated development, Implementation methods and Explanation, pages 6-1 – 6-3.	Support	The FPIC strongly supports this policy, its implementation methods and explanation given its references and provisions relating to: District plans and development planning mechanisms; Advocacy; District plan provisions for rural residential development; Growth strategies; Urban development planning;	Retain.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			 A coordinated approach. These provisions align with Future Proof guiding principles and priority actions for implementation to have development of the built environment including transport and other infrastructure occur in a planned and coordinated manner which: is guided by a set of agreed development principles; recognises and addresses potential cumulative effects of development; and is based on sufficient information to allow the assessment of potential long term effects. 	
14.	Policy 6.1 Planned co-ordinated development, Implementation method 6.1.1, page 6-1.	Support in part	The FPIC supports Implementation Method 6.1.1 on District plans and development planning mechanisms. The FPIC also supports the wording of this method that territorial authorities shall have particular regard to the principles in section 6A when preparing, reviewing or changing district plans and development planning mechanisms such as structure plans, town plans and growth strategies. Given the import of the development principles in 6A, the FPIC is also of the view that territorial authorities should also have particular regard to them with respect to consent decisions as well. This implementation method would therefore read as follows:	Amend Implementation method 6.1.1 as requested (or similar) so that Territorial Authorities shall have particular regard to the principles in section 6A in relation to resource consent decisions.
			6.1.1 District plans and development planning mechanisms Territorial authorities shall have particular regard to the principles in section 6A when preparing, reviewing or changing district plans and development planning mechanisms such as structure plans, town plans, and growth strategies and resource consent decisions.	
15.	Policy 6.1 Planned co-ordinated development,	Support in part	There is merit in directing rural-residential development away from certain areas. However, historic patterns of subdivision mean that it is not always possible to fully protect high class soils and significant mineral resources from further subdivision.	Amend Implementation method 6.1.4 as requested (or similar) so that it accounts for the fact that

Proposed RPS Provision(s)	S Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
Implementation method 6.1.4, pag 6-1.	ge	This should be reflected in the explanation associated with Implementation method 6.1.4. It is requested that the wording below (or similar) be added at the end of the existing wording in Implementation method 6.1.4 so that it reads as follows: 6.1.4 District plan provisions for rural-residential development District plans shall ensure that Historic subdivision patterns mean that there is a conflict between the policy and ongoing subdivision pressures in some locations, particularly near Hamilton. A transition period will be required in such areas before the policy is able to be given effect to.	historic patterns of subdivision in some areas may impact on a District Plan's ability to better protect high class soils and significant mineral resources from further subdivision.
16. Policy 6.3 Coordinating grow and infrastructure Implementation methods and Explanation, page 6-6 – 6-8.	,	 This policy, its implementation methods and explanation are strongly supported. These provisions are in line with Future Proof's integrated approach to planning as well as its guiding principles, and implementation actions. Future Proof supports this policy's intention to ensure that: The nature, timing and sequencing of new development is coordinated with funding and infrastructure; The spatial pattern of land use is for an outlook of at least 30 years and sufficiently informs the RLTS; A coordinated and integrated approach across regional and district boundaries and agencies is achieved. The FPIC particularly supports the following implementation methods for this policy given their alignment with similar provisions in the Future Proof Strategy: Plan provisions which provide for the long-term strategic approach to the integration of land use and infrastructure; Ensuring that transport planning and land use initiatives are aligned; Ensuring financial provision is made for infrastructure and services required for each development/redevelopment area; 	Retain.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			 District Plans ensuring that for areas not subject to a growth strategy that urban development is predominantly directed to existing towns and/or is well connected with those towns; Transport planning; and Working with neighbouring regions. 	
17.	Policy 6.4 Marae and Papakainga, Implementation methods and Explanation pages 6-8 – 6-9.	Support	This policy, its implementation methods and explanation are generally supported as they align with Future Proof guiding principles, priority actions, and Tāngata Whenua provisions to recognise the importance of Marae and Papakainga, and to provide for their use and development. Also, Papakainga is part of the preferred scenario with underpins the Future Proof Strategy. This policy rightly recognises the importance of Marae and Papakainga but the growth (in terms of the population figures) associated with them is not provided for in <i>Table 6-1: Allocation and staging of residential growth 2006-2061</i> and consequently, the actual population figures may exceed the figures set out in Table 6-1 in some areas. It is therefore proposed that a footnote be added to Table 6-1 to acknowledge this. This is detailed further at submission #39.	Retain Policy 6.4 and note that a request is made at submission point #39 to amend Table 6.1 by adding a footnote which recognises that the population growth associated with Marae and Papakainga is not provided for and that consequently the actual population figures may exceed those set out in some areas.
18.	Policy 6.6 Significant infrastructure and energy resources, Implementation methods and Explanation, pages 6-10 – 6-11.	Support	The FPIC generally supports this policy, its implementation methods and its explanation as they align with Future Proof guiding principles, priority actions and provisions on energy and affordable and sustainable infrastructure.	Retain.
19.	Policy 6.7 Access to Minerals, Implementation	Support in part	Securing access to mineral resources is an important resource management responsibility for councils, where those resources are essential to community wellbeing. However the proposed mapping for the Future Proof sub-region should	Amend Implementation method 6.7.1 as requested.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
	Method 6.7.1, page 6-12.		be restricted to a narrower range of circumstances than is indicated in notified Implementation method 6.7.1 and so the FPIC propose a new Policy 6.13 g) (set out at in further detail at submission point #26) to account for this.	
			In order to link up our proposed new Policy 6.13 g) and Policy 6.7, it is requested that the following words be inserted at the start of Implementation method 6.7.1:	
			6.7.1 Identification of mineral resources Except as provided for in Policy 6.13 g), Waikato Regional Council will seek to work with	
20.	Policy 6.8 Information collection, Implementation methods and Explanation, page 6- 13.	Support	The FPIC supports this policy, its implementation methods and explanation to collate information and keep records on locations, lot numbers, lot sizes of subdivision consents and locations of vacant residential lots and industrial lots. Keeping these sorts of records align with Strategy provisions to monitor and review information, records and the trends that they display.	Retain.
21.	Policy 6.12 Governance collaboration in the Future Proof area, Implementation method 6.12.1 and Explanation, pages 6-16 – 6-17.	Support in part	It is important for the effective and sustained implementation of the Future Proof Strategy to have these provisions in place in the Proposed RPS. Therefore this policy, implementation methods 6.12.2 to 6.12.3 and explanation are all strongly supported. They give direct statutory effect to the Future Proof Strategy and its implementation relationships. However while it is appropriate for councils to implement Future Proof, because that document will be updated from time to time, it is important that the Proposed RPS recognise this and the following amendment is requested to Implementation method 6.12.1 to account for this:	Amend Implementation method 6.12.1 as requested to account for the fact that the Future Proof Growth Strategy will be updated.
			6.12.1 Resourcing implementation Waikato Regional Council, Hamilton City Council, Waipa District Council and	

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			Waikato District Council should ensure governance structures are in place, and adequate resources provided, to facilitate the implementation of the actions in the Future Proof Growth Strategy (2009) and subsequent updates.	
22.	Policy 6.13, Adopting Future Proof land use pattern, a), page 6-17.	Support in part	The FPIC supports this policy but proposes a minor amendment to delete the word 'North' from the reference "Horotiu North". The term Horotiu North has no local reference.	Delete the word "North" from the reference "Horotiu North" but retain the rest of the policy except as amended below in submission #23.
23.	Policy 6.13, Adopting Future Proof land use pattern, a) and d) page 6-17.	Support in part	The FPIC requests the deletion of the word "indicative" from Policies 6.13 a) and d). We are concerned that the word 'indicative' could be interpreted to mean a loose framework or guideline for an urban settlement pattern rather than as intended i.e. that urban limits are 'indicated' on Map 6.1 given the scale of the maps and the inability to provide precise property boundaries. We request that policies 6.13 a) and d) now read as follows: Policy 6.13 Adopting Future Proof land use pattern Within the Future Proof area: a) new urban development within Hamilton Cityshall occur within the indicative Urban Limits shown on Map 6.1 (section 6C); d) new industrial development should predominantly be located in the strategic industrial nodes in Tables 6.2 and 6.2(a) (section 6C)Other industrial development should only occur within the indicative Urban Limits shown indicated on Map 6.1 (section 6C), and providing adverse effectsare avoided;	Amend policies 6.13 a) and d) so that references to the word "indicative" in relation to the Urban Limits on Map 6.1 are deleted. This will reduce the likelihood of parties misinterpreting the urban limits as a loose framework or guideline for an urban settlement pattern. Also amend 6.13 (d) to account for industrial development in proposed new Table 6.2(a) in submission point #41 below.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			A consequential amendment to the heading of Map 6-1 to remove the word "indicative" for the same reasons as set out here is requested at submission point #37 below.	
24.	Policy 6.13, Adopting Future Proof land use pattern, b), c) and f), Implementation methods, page 6-17 – 6-18.	Support	The FPIC supports Policies 6.13 b), c) and f), and all the implementation methods (except as amended in other areas of this submission eg submission point #28). It is vitally important for the long-term planning approach for the sub-region that these provisions are all retained. These give statutory effect to the Future Proof sub-regional settlement pattern through the use of urban limits, outlining of growth allocations, and the identification of growth areas and associated timing. The Future Proof sub-regional settlement pattern is the cornerstone of the Strategy.	Retain.
25.	Policy 6.13, Adopting Future Proof land use pattern, e), page 6-17.	Support in part	 The North Waikato Strategic Industrial Node Study has been undertaken as a result of a recommendation of the Future Proof Business Land Review as well as the identification of a potential North Waikato strategic industrial node in the Proposed RPS (in notified Table 6-2), subject to further work being undertaken. The interim findings of the North Waikato Strategic Industrial Node Study are that: The Waikato District draws heavily from the productive rural sector. Value-added processing industries are located near these primary industry sectors. Approximately 50% of land dedicated to industrial activities in the Northern Waikato is located in rural areas, not in single strategic nodes. The initial conclusions of this Study are that the Proposed RPS should ensure that it enables the management of value-added industry which is a vital part of a 	Amend Policy 6.13 e) as requested or similar so that it provides for rural industry. This will enable the Proposed RPS to account for the findings of the North Waikato Strategic Industrial Node Study as indicated in notified Table 6-2.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			The FPIC therefore proposes the following amendments to Policy 6.13 e) to make provision for rural industry as a result of the North Waikato Strategic Industrial Node Study: e) new industrial development in areas other than the strategic industrial nodes in Table 6.2 (section 6C) shall be provided for as appropriate in district plans. These areas shall be predominantly for the provision of local service employment small scale industrial OR for industry which has a functional and compelling need to locate in the rural area in close proximity to the primary product source. They and shall not be of a size or location where they undermine the role of any strategic node or have an adverse effect on the arterial road network and other infrastructure;	
26.	NEW Policy 6.13 g)	Support	Securing access to mineral resources as set out in Policy 6.7 of the Proposed RPS is an important resource management responsibility for councils, where those resources are essential to community wellbeing. However it is considered that the proposed mapping for the Future Proof sub-region should be restricted to a narrower range of circumstances than is indicated in notified Implementation method 6.7.1. Given the Future Proof sub-region's urban growth rate, it is considered that mapping by councils in the sub-region should only be contemplated for aggregate resources where there is significant potential conflict between extraction and other land uses (i.e. a strong demand for the mineral and strong land use development pressures). Such pressures have a number of implications for the sub-region's future development. Therefore it is considered unnecessary to map aggregate resources in the Future Proof sub-region per Implementation method 6.7.1 where no such conflict exists. There is also no need to further map coal resources in the	Add a new policy 6.13 g) as requested so that proposed mapping of aggregate resources in the Future Proof sub-region take place only where there is a significant potential conflict between extraction and other land uses.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			Future Proof sub-region because these are already well known. Therefore it is proposed that a new policy 6.13 g) be added to make an exception for the Future Proof sub-region in terms of securing access to minerals. This policy would read as follows: Policy 6.13 Adopting Future Proof land use pattern Within the Future Proof area: g) Waikato Regional Council will seek to work with territorial authorities, iwi authorities, relevant industry and other agencies to identify and map the location of significant aggregate resources (hard rock and sand) where there is both existing or reasonably foreseeable future demand for the resources, and existing or reasonably foreseeable future land use development pressures are likely to constrain or prevent extraction of those resources.	
27.	Policy 6.13, Adopting Future Proof land use pattern, Explanation, page 6- 18.	Support in part	The explanation to Policy 6.13 should be amended to include the intention of a Strategic Industrial Node being to recognise that some industrial areas are particularly important to the economic, social and infrastructural needs of a locality and the region, and that future industrial development should focus on the support and protection of these major centres. Such an amendment would also support the content of Table 6-2. Therefore it is requested that the first paragraph of the Explanation to Policy 6.13 be amended to read as follows (or similar): Explanation Policy 6.13 limits urban development to the land use pattern and sequencing that has been established through the Future Proof process. New urban development can occur in centres that do not have urban limits Some industrial areas are	Amend the Explanation to Policy 6.13 at the end of the first paragraph as requested (or similar) to recognise that some industrial areas are particularly important to the economic, social and infrastructural needs of a locality and the region, and that future industrial development should focus on the support and protection of these major centres.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			particularly important to the economic, social and infrastructural needs of a locality and the region, and that future industrial development should focus on the support and protection of these major centres	
28.	Policy 6.13, Adopting Future Proof land use pattern, Implementation method 6.13.2, page 6-18.	Support in part	Waipa rural and rural village areas are not serviced and are not appropriate to service. We therefore propose the following amendment to Implementation method 6.13.2 to account for this: 6.13.2 Land release Hamilton City Council, Waipa District Council and Waikato District Council shall provide zoned land and where appropriate serviced land in accordance with Tables 6.1 and .6.2 and 6.2(a) in Section 6C	Amend Implementation method 6.13.2 as requested to recognise that not all towns, villages or rural areas can be serviced and to account for development in proposed new Table 6.2(a) set out in submission point #41 below.
29.	Policy 6.14, Density targets for Future Proof area, Implementation methods and Explanation, page 6-18 – 6-19.	Support	This policy (and its implementation methods and explanation) is strongly supported because it gives statutory effect to the Future Proof sub-regional settlement pattern through the provision of target residential densities. The Future Proof Strategy promotes a compact urban form and this policy will over time, ensure that urban development becomes for compact. In line with similar provisions in the Future Proof Strategy, the FPIC supports that this approach will improve public transport and the promotion of alternative modes of travel such as walking and cycling. Some of the other benefits of this approach include reduced transport impacts on air quality and reduced urban sprawl onto high quality rural land.	Retain.
30.	Policy 6.15, Commercial development in the Future Proof area,	Support in part	The FPIC supports this policy, its implementation methods and its explanation because they support Future Proof principles and themes in relation to: • future commercial development;	Amend Policy 6.15 to provide for the activities permitted by the Operative plan Change for Titanium Park.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
	Implementation methods and Explanation, pages 6-19 – 6-20.		 supporting existing commercial centres; encouraging development to support existing infrastructure; and ensuring thriving town centres where people can "live, work, invest and visit". The policy as drafted does not recognise the full range of activities within Titanium Park. The Titanium Park plan change is operative and the site is being developed. It is therefore appropriate that it be provided for. 	
31.	Policy 6.16 Rural Residential development in Future Proof area, Implementation methods and Explanation, pages 6-20 – 6-21.	Support	This policy, its implementation methods and explanation is generally supported because it aligns with a number of growth issues that Future Proof (through its settlement pattern) aims to address such as: Significant amounts of rural residential development; Loss of productive rural land; and Difficulty in achieving timely and efficient infrastructure servicing. It is also a Future Proof Strategy aim to address community expectations of tighter controls on rural residential development. Given that parts of the region are very intense in rural residential development patterns, and that in some areas significant amounts of land with high quality soil for rural/productive use is increasingly being compromised by rural residential development it is important to ensure that this policy is strong enough.	Retain
32.	Policy 6.17 Monitoring development in Future Proof area, Implementation methods and Explanation, pages	Support	The FPIC supports this policy, implementation method and explanation. These provisions align with monitoring and review provisions in the Strategy. This level of information will also help to keep Future Proof decision-makers adequately informed so that changes to Policy 6.13 (Adoption of Future Proof land use pattern) can be better assessed.	Retain.

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
	6-21 – 6-22.			
33.	Policy 6.18 Review of Future Proof map and tables, Implementation methods and Explanation, page 6- 22.	Support	This policy, implementation method and explanation are supported as it is in line with Future Proof's collaborative approach.	Retain.
34.	Chapter 6A Development Principles, page 6- 23.	Support	The FPIC supports how these principles are set out. In particular Future Proof supports that these principles are given weight to through other policies and implementation methods in the Proposed RPS e.g. Policy 6.1(a), Implementation methods 6.1.1, 6.1.2 and 6.1.11.	Retain.
35.	Figure 6-1: Significant transport corridors, page 6-25.	Support	The inclusion of this figure in the Proposed RPS is supported.	Retain.
36.	Map 6.1A: Significant transport corridors (Hamilton), page 6-26.	Support	The inclusion of this map in the Proposed RPS is supported.	Retain.
37.	Map 6-1 Future Proof indicative urban limits, page 6-27.	Support	The inclusion of this map in the Proposed RPS is supported but an amendment is requested to its title to remove the word "indicative". Links to this submission point are set out earlier at submission point #23. Therefore the heading of this map would read as follows: **Map 6-1 Future Proof indicative urban limits**	Retain Map 6-1 but amend its heading to remove the word "indicative" for the reasons set out in submission point #23 above.
38.	Table 6-1: Allocation	Support in	Table 6-1 is supported with amendments. It is appropriate for population	It is suggested that Table 6-1 be

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
	and staging of residential growth 2006-2061, page 6-28.	part	projections to be made and for district plans to reflect these targets. However, the table needs to be amended whenever improved information comes to hand. The existing Table 6-1 is based on 2006 Census data, and did not take into account the growth within the former Franklin District and Proposed Variation 16 to the Proposed Waikato District Plan which is introducing more restrictive rural subdivision rules. Further refinements to Table 6-1 will be possible and could be made by the Regional Council once data from the next Census is available and improvements to the population model are made. The analysis could also incorporate the area that was formerly part of Franklin District, and hence cover all of the Waikato District. Waikato DC would prefer this. Amending Table 6-1 through the current submission process to the Proposed RPS (provided that the relevant data is available) may enable the Regional Council to avoid having to undertake a variation to the Proposed RPS in future to update this table.	amended if possible during the Proposed RPS process if new figures become available through analyses undertaken by Future Proof partners which take account of the data from the next Census.
39.	NEW footnote to Table 6-1.	Support	It is proposed that a footnote be added to Table 6-1 to acknowledge that the growth and locations contained within it do not take account of growth associated with Marae and Papakainga development, and therefore actual population figures may exceed those staged in some areas. The following wording is requested or similar: Table 6-1: Allocation and staging of residential growth 2006-2061 1 1. The above population figures in any given location do not take account of growth associated with Marae and Papakainga development. Consequently, actual population figures may exceed the above figures in some areas.	Add a footnote to Table 6-1 as requested or similar which acknowledges that the figures in Table 6-1 do not include the growth associated with Marae and Papakainga development, and therefore the actual population figures may exceed those stated in some areas.
40.	Table 6-2: Industrial land allocation in the	Support in part	In general the FPIC supports the Strategic Industrial Nodes identified in this table, and the industrial land allocations and timing it sets out. However as indicated	Amend Table 6-2 as requested (or similar). In particular give

Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
FutureProof area, page 6-29.		earlier in Part A of this submission, the FPIC suggests a number of amendments to Table 6-2 to account for: The findings of the North Waikato Strategic Industrial Node Study; Further work undertaken on the Ruakura Estate which was not available when the Proposed RPS was notified; Existing provisions in the Proposed RPS around airside land at the Hamilton Airport; The release of the draft Waipa District Plan review, including its aims around balancing commercial and industrial land and in particular the addition of Hautapu as a Strategic Industrial Node; The desire to have all Strategic Industrial Nodes identified and their quantum and staging included so that changes do not have to be made to the RPS in a relatively short time after it has been made operative; The need for increased flexibility around the staging of development in Strategic Industrial Nodes; The correct names of Strategic Industrial Nodes; Ensuring that we have certainty around the land use pattern. This is essential: for Waikato Expressway implementation, particularly for the location and design of interchanges; and from an integrated planning perspective. Integrating infrastructure with land use is also a Regional Council function under section 30(1)(gb) of the RMA 1991. REQUESTED AMENDMENTS TO TABLE 6-2: Specifically the FPIC suggest the following amendments be made Table 6-2 to better account and provide for the above-listed factors: Delete the reference to "North" from "Horotiu North" because the term "Horotiu"	 A request to remove the word "North" from "Horotiu North" given the lack of local reference to an area called "Horotiu North"; The proposed reduction of in industrial land provision at the Hamilton Airport from 152ha to 127ha given the provisions of policy 6.13(f) in the Proposed RPS; An increased industrial land allocation at Ruakura from 130 ha to 405 ha as a result of further work undertaken on the Ruakura Estate which was not available when the Proposed RPS was notified; The inclusion of a new Strategic Industrial Node at Hautapu and an industrial land quantum of 96 ha at that site; The addition of a new footnote 1 to enable land in another strategic industrial node to be brought forward
	l		

Proposed RPS Suppor Provision(s) Oppos		Relief Sought from Environment Waikato
	North" has no local reference for the Waikato District. The centre of Horotiu is Horotiu Road, and with urban limits being proposed to the north and south of Horotiu Road, the area it encompasses is referred to as "Horotiu" and not "Horotiu North"; Increase the total industrial land provision at Ruakura from 130 ha to 405 ha and increase the staging allocations to 80 ha for the 2010-2021 period, 115 ha for the 2021-2041 period, and 210 ha for the 2041-2061 period; Reduce the total industrial land provision for the Hamilton Airport from 152 ha to 127 ha and reduce the staging allocations to 61 ha for the 2010-2021 period, 39 ha for the 2021-2041 period, and 27 ha for the 2041-2061 period; Include Hautapu as a Strategic Industrial Node and allocate it a total quantum of 96 ha with staging allocations of 20 ha in the 2010-2021 period, 30 ha in the 2021-2041 period and 46 ha in the 2041-2061 period; Add a new footnote 1 to enable land in another Strategic Industrial Node to be brought forward (subject to the approval of the Future Proof partners) if development does not proceed in another Strategic Industrial Node; Add a new footnote 2 enabling land allocated in one stage for a Strategic Industrial Node to be transferred to another stage for that same node; Renumber the notified footnote 1 setting out what Gross Developable Area means as footnote 3; Deletion of the reference in the final row of the table to "Potential North Waikato Strategic Node" and notified footnote 2 as this is covered off in proposed amendments to Policy 6.13 e) in submission point #25 above and a proposed new Table 6.2(a) requested in submission point #41 below; Add a new footnote 4 beside Ruakura to acknowledge that the detailed development planning for this Strategic Industrial Node is being addressed through structure planning being undertaken by Hamilton City Council and the Review of the Hamilton City District Plan.	 (subject to the approval of the Future Proof partners) if development does not proceed in another strategic industrial node; The addition of a new footnote 2 enabling land allocated in one stage for a Strategic Industrial Node to be transferred to another stage for that same node; A request to renumber the notified footnote 1 setting out what Gross Developable Area means as footnote 3; A request to delete both the reference in the final row of the table to "Potential North Waikato Strategic Node" and notified footnote 2 as this is covered off in proposed amendments to Policy 6.13 e) in submission point #25 above and a proposed new Table 6.2(a) requested in submission point #41 below; The addition of a new footnote 4 beside Ruakura to acknowledge that the detailed development
	Review of the Hamilton City District Plan.	footnote 4 beside Ruakura to acknowledge that the

Proposed RPS Support / Provision(s) Oppose		Subm	ission Detai			Relief Sought from Environment Waikato
	Table 6-2: Industrial lan	d allocation	in the Futur	e Proof area	<u>1, 2</u>	planning for this Strategic Industrial Node is being addressed through structure
	Strategic Industrial Nodes located in	Industria	al land alloca timing (ha)		Total Allocation	planning being undertaken by Hamilton City Council and the Review of the Hamilton
	Central Future Proof area (based on gross developable area) 43	on gross 2021 2041	2041 to 2061	2010-2061 (ha)	City District Plan.	
	Rotokauri	85	90	90	265	
	Ruakura <u>4</u>	30 80	70 <u>115</u>	30 <u>210</u>	130 405	
	Te Rapa North	14	46	25	85	
	Horotiu North	56	84	10	150	
	Hamilton Airport	70 61	46 39	36 <u>27</u>	152 <u>127</u>	
	Huntly and Rotowaro	8	8	7	23	
	<u>Hautapu</u>	<u>20</u>	<u>30</u>	<u>46</u>	<u>96</u>	
	TOTAL HA	263 324	344 412	198 415	805 <u>1151</u>	
	Potential North Waikato Strategic Industrial node2					
	Where development do (i) a particular str					

Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
	••	(ii) within the staging as outlined in Table 6-2	
		then another identified strategic industrial node may be brought forward, subject to	
		the approval of the Future Proof partners. 2. Where from an infrastructure efficiency perspective it is desirable to increase the	
		land area allocated for a specific Strategic Industrial node at any earlier stage, then	
		subject to the approval of the Future Proof partners, the difference may be	
		transferred from another stage for that node.	
		4. <u>3</u> Gross Developable Area includes land for building footprint, parking,	
		landscaping, open space, bulk and location requirements and land for	
		infrastructure including roads, stormwater and wastewater facilities.	
		² Further work is to be undertaken on a potential strategic industrial node for the North Waikato. This work will reflect boundary changes to Waikato District Council	
		coming into affect on 1st November 2010.	
		4. This Regional Policy Statement provides land quantum and general staging for	
		Ruakura. The detailed development planning will be dealt with through structure	
		planning being undertaken by Hamilton City Council and the Review of the	
		Hamilton City District Plan.	
		INCREASED FLEXIBILITY TO TABLE 6-2	
		The FPIC acknowledges that there needs to be some flexibility around the	
		proposed staging for the Strategic Industrial Nodes identified in Table 6-2 to	
		provide for that fact that circumstances with industrial land provision and allocation	
		may change and there could be a need to move some developments forward in	
		time while others are delayed. There could be a variety of reasons for this	
		happening including a change in market circumstances, the timing of infrastructure and servicing and the availability of funding. Therefore footnotes 1 and 2 to Table	
		6-2 have been proposed to account for these situations.	
		INDUSTRIAL LAND ALLOCATIONS AT RUAKURA, HAMILTON	

Proposed RPS Provision(s)	Support / Oppose	Submission Detail AIRPORT AND HAUTAPU	Relief Sought from Environment Waikato
		Specific reasons setting out the proposed changes for an increase in industrial land provision at Ruakura, reduced provision around the Hamilton Airport, and for new provision at Hautapu as a Strategic Industrial Node are as follows:	
		(A) INCREASE IN THE PROVISION OF LAND FOR RUAKURA	
		 a) General Background 1.1 The concept of locating employment land at Ruakura has been planned for 10 years or more. Ruakura is an identified growth area in the Future Proof Strategy and the Hamilton Urban Growth Strategy. Table 5 of the adopted Future Proof Strategy makes provision for 310 ha of industrial land at Ruakura, though these figures were not carried through into Table 6-2 of the Proposed RPS. 	
		1.2 The Future Proof Business Land Review recommended Ruakura as a strategic industrial node however, the Business Land Review only allocated 130 ha of industrial land to the area. The main reason for this was not about the suitability of the site but about ensuring that industrial land supply in the subregion did not exceed the forecast of 805 ha. In forecasting the amount of industrial land needed the Future Proof Business Land Review used historical industrial land uptake assumptions and labour force data which is demographically based. However, there is also room for a certain amount of demand driven growth. It is the view of the Future Proof partners that the industrial land at Ruakura aligns well with Future Proof policies and principles. In particular those relating to compact urban form, sustainability and live, work,	

_

¹ Report to SmartGrowth, *Business Land Requirements Review Western Bay of Plenty*, Phil McDermott Consultants, October 2006 at page 2

Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
		play. There is a need to also factor in growth drivers such as inter-regional and international exports, the degree of specialisation and comparative advantage. ² Making provision for this site is about growing the regional economy and the promotion of economic development. In addition the developer is promoting a comprehensive plan, aligned with strategic intentions.	
		1.3 The total landholding at Ruakura is approximately 776 ha. This includes industrial, commercial, residential and parks / reserve land. Around 405 ha is planned for the inter-modal terminal / logistics hub and general industrial employment land.	
		1.4 It is the inter-modal terminal / logistics hub and the research innovation components of the development that are of most significance. It is these features that contribute to the Waikato region's competitive advantage in agricultural research and as a logistics and transport hub supporting upper North Island economic development.	
		1.5 To a large extent, the proposed development of the Ruakura Inland Port and logistics hub is targeting the excess growth in Auckland. Constraints on growth in Auckland include increasing traffic congestion, higher land costs and diminishing access to skilled labour. The proposed development of Ruakura addresses all of these constraints, thereby alleviating the pressure on Auckland. While it is not possible to accurately predict how much uptake will be from local activity and how much will be from activity attracted from outside the Future Proof sub-region, transport modelling assumptions have been made and these are detailed in sub-section (g) below. The uptake of industrial land at Ruakura is likely to significantly exceed local historical industrial land uptake, therefore warranting an increase from 130 ha to 405 ha over the period 2010 to	

² Ibid at page 2

Proposed RPS Provision(s)	Support / Oppose	Submission Detail 2061.	Relief Sought from Environment Waikato
		1.6 The Waikato region is uniquely placed in terms of the 'Golden Triangle' of Auckland, the Waikato and the Bay of Plenty. These three regions are expected to contain 53% of the nation's population by 2031 and account for over half of New Zealand's total economic activity.	
		 b) Detailed Background Investigations 1.7 A report completed by Castalia Strategic Advisors for the Ruakura development states that: 	
		Ruakura Estate presents a unique opportunity for large-scale commercial and industrial development in the heart of the Golden Triangle. It has efficient transport links to the main North Island portsand the ability to draw on the local labour force and take maximum advantage of Waikato's role as the fastest growing source of freight in the North Island. ³	
		1.8 Ruakura is a unique site. It is significant in both local and national terms. At the local level it will result in increases in employment for Ruakura and Hamilton City. At the national level it has the potential to influence national employment through increased efficiency and productivity within the Golden Triangle. ⁴ It also has the potential to reduce time and travel costs for businesses. This is important at a national level because of the need to get freight efficiently to key local, national and international markets. Ruakura has the potential to: ⁵	
		 Lower overall supply chain costs for importers and exporters Offer ease of use for the movement of high volume cargo for off-rail 	

Gastalia Strategic Advisors, Ruakura Intermodal Terminal, October 2010 at page ii
 Ibid at page 34

Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
		 shippers Avoid congestion through Auckland City and at the Ports Create co-location opportunities between the intermodal terminal and the adjacent commercial and industrial park at Ruakura Achieve a much greater modal shift to rail, offering shippers a more environmentally acceptable transport solution and reducing transport impacts on the roading network Achieve competitive efficiencies for New Zealand importers and exporters through the volume use of rail 	
		1.9 The site builds on an existing business land precinct which includes Ag Research and the Waikato Innovation Park. The proposed Ruakura Estate development will integrate with the future development of the Waikato Innovation Park, Ruakura Research Centre and the University of Waikato.	
		c) Alignment with Future Proof Strategy 1.10 The Future Proof Strategy also anticipates a significant amount of residential growth in the long-term occurring to the south of the Hamilton CBD (for example in the Peacocke growth area). Employment land options to the south and south-east will provide for more sustainable development patterns. This outcome will also support the vitality of the CBD and the balance of planned employment growth to the north e.g. Rotokauri. Ruakura will make up a significant part of the employment land needed to support the population growth. It is also within the urban limits of Hamilton City as contained in the Proposed RPS.	
		1.11 For these reasons the Future Proof partners wish to ensure that Ruakura remains a Strategic Industrial Node with a sufficient provision of land. The current provision of 130 ha is not enough to realise the unique economic benefits available to the Waikato region. This amount needs to be increased	

Proposed RPS Provision(s)	Support / Oppose	Submission Detail to 405 ha to take full advantage of the site.	Relief Sought from Environment Waikato
		d) Ruakura Advantages 1.12 The following provides a summary of the main reasons why Ruakura is such an important site to the sub-region and region and the distinct advantages that it has:	
		 Well serviced by existing and planned transport links (the East Coast Main Trunk rail line, the Waikato Expressway, the local roading network and Hamilton International Airport). Prime location for an inland Port and logistics hub to service the Ports of Auckland and the Port of Tauranga as it is equidistant from both Ports. Within close proximity to Hamilton CBD – Ruakura is located 3 kilometres from the CBD. The potential to strengthen the Hamilton CBD and assist with its regeneration as the activity at Ruakura is likely to encourage supporting professional services which will locate in the CBD. Promotes live, work and play opportunities which is a principle of the Future Proof Strategy by providing employment close to existing residential areas within Hamilton City. Improves land use balance by providing employment opportunities on the eastern side of the Waikato River (where there are a number of existing and future residential areas planned) which will reduce crosscity movements, thereby reducing congestion and delaying expenditure on more infrastructure.⁶ Builds on an established industrial activity node and innovation precinct. Sufficient size to achieve critical mass and allow for agglomeration benefits. 	

_

⁶ Ruakura Estate: Strategic Directions and Master Planning Report, September 2010 at page 11

Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
		 A lot of existing infrastructure is already in place or planned. Making provision for more land at Ruakura has the potential to make a major contribution to the growth of the Waikato economy as an upper North Island logistics and distribution centre. Has the potential to enhance New Zealand's competitive export advantage through the volume use of the rail network. Has sufficient scope for expansion and future growth. There are not any other sites of sufficient size or in the right location for this type of activity in the Waikato Region. It will achieve more efficient use of transport infrastructure, particularly through greater use of the existing rail network. Has the potential to contribute to the national economy as well as employment opportunities. The benefits of having only a few land owners. 	
		1.13 Hamilton City Council has made commitments to infrastructure adjacent to Ruakura which enable further development to occur.	
		1.14 There is now much more detail around the Ruakura growth area following the development of a comprehensive master plan. This was not available at the time the Proposed RPS was notified.	
		1.15 There are compliance cost advantages in taking an upfront approach to this development now in order to provide land use certainty. This is preferable to attempting to achieve the full Business Case through incremental re-zonings with all the inherent uncertainties and high compliance costs. The Future Proof partners are of the view that the Ruakura industrial land needs to be identified now so that it can be strategically planned for and full advantage can be taken of this unique site. The strategic integration of infrastructure with	

Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
		land use is a Regional Council function as is the integrated management of natural and physical resources (which includes land and all structures). Identifying this site as part of the land use pattern allows for these functions to be fulfilled.	
		1.16 The Future Proof Strategy recognises that the Waikato region and the nation, will suffer if the use of highly-versatile land is not planned or undertaken with a long-term sustainable view. The issue however, is that land rated as having only slight constraints for urban development is generally the same land that is highly versatile for agriculture. Good land management practices protect and maintain the productive characteristics of soil and enable land to achieve its sustainable productive capacities. The loss of highly versatile land is minimised. These considerations however need to be balanced with the practicalities of retaining large areas of farmland within a future Hamilton city boundary. Therefore the retention of agricultural lands is considered alongside other outcomes of effective growth management such as the provision for future employment.	
		 e) Staging of Proposd Ruakura Development 1.17 The following staging is proposed for Ruakura: 2011-2021: 80 ha 2022-2041: 115 ha 2042-2061: 210 ha 	
		 2042-2061: 210 ha 1.18 The staging notified in the Proposed RPS is: 2011-2021: 30 ha 2022-2041: 70 ha 2042-2061: 30 ha 	

 $^{^{7}}$ Section 30(1)(a) and section 30(1)(gb) of the Resource Management Act 1991.

pport / ppose	Submission Detail	Relief Sought from Environment Waikato
1.19	As a result of further structure planning and detailed infrastructure investigations, there are now better insights into the relationship between the land use pattern, infrastructure needs and funding requirements.	
1.20	Earlier discussions on proposed changes to the Ruakura industrial land allocation were for 330 ha. The Future Proof submission to the Proposed RPS now requests 405 ha in Table 6-2 for Ruakura based on the fact that the Ruakura land use map contained in the September 2010 <i>Ruakura Estate Strategic Directions and Master Plan</i> report:	
	 did not include a significant rural-residential development area immediately adjacent to the Ruakura Inland port. did not include proposed Business Land not owned by Tainui Group Holdings Ltd. left an additional land area inside the Waikato Expressway as 'rural'. 	
1.21	While these areas are not properties owned by either Tainui Group Holdings Ltd or Chedworth Park Ltd, they are inside the Proposed Hamilton City and Waikato Expressway boundary. Therefore it is logical from a structure planning perspective to zone and regard this area of land (in particular the rural residential land adjacent to the Ruakura Inland Port) as part of the total industrial land area at Ruakura. There are at least 15-20 rural residential properties which could, from a reverse sensitivity perspective, significantly compromise the 24-hour operation of the inland port. Both of these additional areas have been included as part of the Waikato Regional Transport Model (WRTM) work.	
1.22	The latest plans for development at Ruakura at December 2010 includes these additional areas as follows:	

Proposed RPS Provision(s)	Support / Oppose	Su	bmission Detail		Relief Sought from Environment Waikato
•	Oppose	Ruakura Es Warehouse & Logistics Inland Port Employment TOTAL 1.23 The December 2010 total of in this submission. 1.24 Infrastructure of a scale sufrequired from the outset of waste water, storm water Tainui Group Holdings Ltd is	September 2010 (ha) 46.7 28.0 257.6 332.3 405.43 ha has therefore the development, not services. These are s working closely with	December 2010 (ha) 55.39 31.59 318.45 405.43 e been rounded to 405 ha whole site is likely to be ably the spine road and substantial investments. Hamilton City Council to	
		ensure that the infrastruct particular from an economy-services for other parts of catchment. 1.25 The inland port also ultimate requires a considerable are This is more than traditional ladditional constraints with the port and distribution hub are engagement over the future relocate, and with the separate development. Also the development three transportants in the separate constraints with the separate constraints.	of-scale perspective. If the city which also ely has a significant hea for stormwater man business or industrial a le high voltage power le eas. While there will le of these lines, they a ation buffers and corrice elopers propose a significant head	This includes planning for relate to the Ruakura ardstand component that nagement and treatment. ctivities. The site also has ines over both the inland be ongoing dialogue and re currently expensive to dors, they reduce land for gnificant scale of on-site	

Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
		consume considerable areas of land which have to be added into the first stages of the Ruakura project.	
		1.26 Ruakura anchor tenants are also likely to be of such a scale that they will want a long term solution for their needs. A probable result will be that anchor tenants may commit to much larger areas of land than will be developed in the short term. They could well take the next 20 or so years to have each of their areas fully developed.	
		1.27 Also the inland port is not of itself likely to be economically viable without sufficient lands for the establishment of the distribution hub and warehousing around it. It is envisaged that the inland port will be the facilitator for other activities to establish. It can be likened to the establishment of a power substation or railway station i.e. it is the critical infrastructure element enabling business and industrial activities to locate at Ruakura. It does not of itself represent an industrial or business land use that can function without related activities clustering around at a scale supporting the level of investment required for the inland port.	
		1.28 In the current economic climate, a clear case can be made for a higher land allocation in the 2010-2021 period for Ruakura given that there is a compelling need for economic growth in NZ to be "jump started". This will not happen unless there is a significant investment in the 2010-2021 period in infrastructure and buildings on the Ruakura site. Accordingly, land available to provide a return on that investment and attract new growth to the region must be sufficient in area within that first planning period.	
		1.29 Similarly, the increase in lands for freight and logistics activity will likely further assist both the New Zealand Transport Agency and Kiwi Rail in planning for the completion of the Waikato Expressway and upgrades to the	

Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
		East Coast Main Trunk Line respectively.	
		1.30 The main priority for Ruakura is the 2011-2021 period when there will need to be significant investment in the new Inter-Modal Terminal, roading, stormwater systems and all related infrastructure.	
		f) Comparison of Ruakura with the Meridian 37 site 1.31 What makes Ruakura different from the Meridian 37 proposal that formed the subject of Private Plan Change Request 67 to the Waipa District Plan?:	
		 Meridian 37 is near the Airport; an area where there is already significant provision not taken up (e.g. Titanium Park). Meridian 37 does not have rail or rail access. Meridian 37 area and the Airport site will never be a main transport hub. Ruakura has a greater land area with fewer owners. Ruakura is equidistant between the Ports of Auckland and the Port of Tauranga. It therefore has the potential to be a major North Island freight hub and boost rail efficiency. Ruakura also has a specific development proposal and structure planning work is being undertaken. 	
		 g) Transport Modelling Assumptions 1.32 A range of transport modelling assumptions on two scenarios (high and low) informed the background to the Ruakura development. 	
		1.33 Under the low scenario:	
		 Approximately 23,000 jobs will be located in the Ruakura when fully developed. Around 15,000 of those jobs will compete with established employment centres in the Future Proof area. The key issue is how much 	

•	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
		of the competing land does Tainui need to develop in the short term in order to offset the capital cost of the inland port. Indications are that much more than is currently allowed in Table 6-2 will be needed.	
		 985 households are being added in Ruakura, however approximately 6,800 households are required to service the employment centre. This has been split 50% into Rotokauri stage 2 and 50% across Hamilton City and rural towns (Cambridge, Ngaruawahia for example). 	
	1	1.34 Low Scenario Modelling Assumptions:	
		 985 new households in Ruakura 22,800 additional jobs in Ruakura of which 15,092 are competing and 7708 are new At 2041 in the WRTM there are 0.995 jobs per household On this basis the 7708 new jobs correspond to 7745 households Given that 985 households are being added in Ruakura, 6760 extra households are required These have been split 50.50 to Rotokauri Stage 2 (3380 households represent 44.5% of stage 2 and to be thorough, 44.5% of the corresponding Rotokauri commercial centre has been included) and infill pro rata across the remainder of HCC/Waikato District and Waipa District School and tertiary rolls have been scaled up pro rata across HCC/Waikato District and Waipa District to match the overall percentage 	
		household growth The 15,092 competing jobs have been deducted pro rata from the 2006-41 growth in jobs across HCC/Waikato District and Waipa District. This has been done at an industrial classification level (i.e. individually for retail, wholesale, office, community and primary/secondary industry)	

Proposed RPS Sup Provision(s) Op		Relief Sought from Environment Waikato
	There is still a need to ensure that all land use variables match the target totals. 1.35 High Scenario Modelling Assumptions: 985 new households in Ruakura. 32, 335 additional jobs in Ruakura of which 21, 278 are competing and 11, 057 are new At 2041 in the WRTM there are 0.995 jobs per household On this basis the 11, 057new jobs correspond to 11, 110 households Given that 985 households are being added in Ruakura, 10125 extra households are required These have been split 50.50 to Rotokauri Stage 2 (5062.5 households represent 66.6% of stage 2 and to be thorough, 66.6% of the	Environment Waikato
	corresponding Rotokauri commercial centre has been included) and infill pro rata across the remainder of HCC/Waikato District and Waipa District School and tertiary rolls have been scaled up pro rata across HCC/Waikato District and Waipa District to match the overall percentage household growth The 21,278 competing jobs have been deducted pro rata from the 2006-41 growth in jobs across HCC/Waikato District and Waipa District. This has been done at an industrial classification level (i.e. individually for retail, wholesale, office, community and primary/secondary industry) There is still a need to ensure that all land use variables match the target totals.	

•	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
		no information available on whether there is any impact of the Ruakura development proposal on the existing transport network, or any conflict between road and rail.	
		 h) Impact of the 2008 Global Financial Crisis on Population Forecasting 1.37 It is likely as a result of the Global Financial Crisis that there will be a slowing of the forecast population growth. It will not be possible to understand the full extent of this until the results of the next Census are available at a date yet to be determined by Statistics NZ. 	
		1.38 Also in 2012 Statistics NZ may re-forecast the forward population projections for both the Waikato region and the rest of the growth areas in New Zealand. These may be more focused on extending the timeframes within which the numbers occur rather than a fundamental revision of the numbers per se. When the next Census information becomes available, we will be in a better position to determine the effects of the 2008 Global Financial Crisis on long term demographics.	
		 i) Comprehensive Modelling of Industrial Land on the Proposed Waikato Expressway and Related Transport Network 1.39 No comprehensive impact picture is currently available. This work will be undertaken by the Future Proof partners and the NZTA during 2011-2012. 	
		 j) Development Economics 1.40 While this report has taken into account the forward demand for industrial land and related infrastructure servicing from a broad economic sense, the detailed development economics for Ruakura are the property of Tainui Group Holdings Ltd and are not reflected in this paper. 	
		(B) THE ADDITION OF HAUTAPU	

Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
		1.41 Provision was made for 90 hectares of industrial land at this site in the Future Proof Strategy. Hautapu was assessed as part of the Business Land Review but it was recommended that it be removed as a strategic node as it was considered that it encouraged a dispersed land use pattern and was detached from a significant population base. Hence Hautapu was not included in the notified Proposed RPS.	
		1.42 The Waipa District Council has subsequently advised that it wishes to increase the land area at Hautapu to 96 hectares. Provision for this has been made as part of the draft Proposed Waipa District Plan which was recently notified for submissions at the end of 2010.	
		1.43 The Future Proof partners consider that the Hautapu site has some significant sub-regional and regional advantages. This includes its ability to rebalance employment land with the population growth occurring to the south of the Hamilton CBD, its proximity to Cambridge, the potential for future interregional linkages with the Bay of Plenty and its location close to the Waikato Expressway and the Cambridge / Hautapu industrial siding which joins the East Coast Main Trunk rail line.	
		1.44 Cambridge is forecast to have a population of 25,460 by 2050, an increase of 12,460 people.8 Employment opportunities need to be provided close to Cambridge in order to support the growing population. It is also important to anticipate the growth stimulus effect of the completion of the Waikato Expressway on Cambridge. The travel time between Auckland and Cambridge will be reduced by 35 minutes when the Waikato Expressway is completed in 2019, making it a one and a half hour trip. This could encourage	

⁸ Waipa 2050 at page 36

Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
		people living in Auckland to consider Cambridge as a potential lifestyle or retirement location.	
		1.45 At present there are insufficient employment opportunities within Waipa District which necessitates people commuting into Hamilton for work. Providing industrial land at Hautapu would help to address this as it encourages employment within the district.	
		1.46 The draft Waipa District Plan also signals an intention to move zoned industrial land located at Carter's Flat out to Hautapu. So while it appears that we're proposing the "addition" of 96ha of industrial land at Hautapu, we are in effect looking to offset or rebalance some of the 11.7 ha of industrial land provision that already exists in Cambridge in Carter's Flat, out to Hautapu. Carter's Flat is to be the long term location for large format commercial development in Cambridge. This is key to the long-term planning for Cambridge and supporting the Cambridge township. If another site for industrial land is not found then there is a risk that the growth of central Cambridge will be constrained and large format retail will end up situated in an inappropriate location.	
		1.47 Waipa District Council proposes in its 2011 District Plan Review to rezone 11.7ha of existing industrial land as 'deferred commercial' with appropriate triggers.	
		(C) REDUCTION IN HAMILTON AIRPORT INDUSTRIAL LAND PROVISION	
		1.48 A reduction in the provision at the Airport is proposed from152 ha to 127 ha (which is a reduction of 25 ha).	
		1.49 The industrial land table in the Proposed RPS only needs to make provision	

	Proposed RPS Support / Submission Detail Provision(s) Oppose			Relief Sought from Environment Waikato
	for lands owned by Titanium Park (117 ha) and Ashton Family Trust (9.5 ha This totals 126.5 ha but has been rounded up to 127 ha in this submission Any land required in addition to this is provided for in policy 6.13(f) which states as follows:			
			f) 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.	
			1.50 Therefore there is no need for an additional provision of 25 ha from the Montgomerie block which had been originally factored into the Hamilton Airport industrial land provision in Table 6-2 of the notified Proposed RPS.	
41.	NEW Table 6-2(a)	Support	The FPIC considers that a new Table 6.2(a) should be inserted into the Proposed RPS document after Table 6-2. It is the FPIC's view that the industrial land provision for Tuakau and Pokeno (which are now a part of the Waikato District as a result of the Auckland boundary changes which took effect on 1 November 2010 under the Local Government (Auckland Council) Amendment Act 2010) should be set out separately from the other Strategic Industrial Nodes identified in the Central Future Proof area in Table 6-2. This is because Tuakau and Pokeno were not originally a part of the Future Proof industrial land provision of 1350ha in the Future Proof Strategy. The figures for these settlements are sourced from the Franklin	That a new Table 6-2(a) accounting for industrial land provision at Tuakau and Pokeno in the North Waikato be inserted into the Proposed RPS as requested. Also that amendments be made throughout the Proposed RPS as
			Growth Strategy. The FPIC therefore proposes a new Table 6-2(a) be inserted in the Proposed RPS to account for industrial land provision at Tuakau and Pokeno in the North Waikato. It is also requested that the same footnotes 1 and 2 proposed to Table 6-2 in submission point 40 above apply also to Table 6-2(a) for the same reasons.	appropriate to account for the content of Table 6.2(a) in a vein similar to where references have been made to the content of Table 6.2.

Proposed RPS Provision(s)	Support / Oppose		Submis	ssion Detail			Relief Sought from Environment Waikato
		Specifically the following is requested: Table 6-2(a) Industrial Land Allocation – North Waikato 1,2					
		Strategic Industrial Nodes located in North Waikato (based on gross developable area)3	Industrial timing (ha) 2010 to 2021	<u>land alloc</u> <u>2021 to</u> 2041	<u>ation and</u> <u>2041 to</u> 2061	Total Allocation 2010-2061 (ha)	
		<u>Tuakau</u>	<u>35</u>	<u>35</u>	46	<u>116</u>	
		<u>Pokeno</u>	<u>30</u>	<u>30</u>	<u>10</u>	<u>70</u>	
		TOTAL HA	<u>70</u>	<u>65</u>	<u>56</u>	<u>186</u>	
		1. Where development doe (i) a particular stra (ii) within the stage then another identified str the approval of the Future 2. Where from an infrastrue land area allocated for a s subject to the approval transferred from another s 3 Gross Developable Area open space, bulk and loc roads, stormwater and was	ategic industri ing as outlined rategic industri Proof partner cture efficience specific Strate of the Futur stage for that re includes land cation require	al node or din Table 6-2 ial node may rs. cy perspective gic Industrial late Proof part node. difor building the ments and latities.	be brought fo ti is desirable Node at any e ners, the diff footprint, park nd for infrast	e to increase the arlier stage, then ference may be ing, landscaping, ructure including	

ipport / ppose	Submission Detail	Relief Sought from Environment Waikato
	INCLUSION OF TUAKAU AND POKENO IN A SEPARATE INDUSTRIAL LAND PROVISION TABLE (i.e. TABLE 6.2(A)). The addition of parts of Franklin District to the Waikato District and the Waikato Region from 1 November 2010 as part of the Auckland local government boundary changes has meant that there was a need to review the industrial land provisions. Both Pokeno and Tuakau have provision for industrial land which is now part of the Waikato.	
	Given that the Waikato District now has an expanded area which brings it close to Auckland and an increased population base this has potentially increased the amount of industrial land required in the Future Proof sub-region. The original forecasts for industrial land demand completed as part of the Future Proof Business Land Review did not factor in all of these changes.	
	The North Waikato Strategic Industrial Node Study has addressed the addition of these two areas. The interim findings of the Study recommend that the RPS should recognise the Pokeno and Tuakau industrial nodes. The Study also notes that there is significant interaction between the North Waikato and Auckland and significant opportunities exist as a result of these interactions.	
	Industrial land for both Tuakau and Pokeno is identified in the Franklin Growth Strategy (2007). The industrial land at Tuakau is already zoned in the Franklin District Plan and the industrial land at Pokeno has been zoned as part of Proposed Plan Change 24.	
	Pokeno is expected to growth from a village of 585 people in 2004 to more than 5,200 by 2051. There is currently 70 ha of industrial land available in Pokeno. This area has advantages because of its access to State highways 1 and 2 which provides good connections with Auckland, Hamilton and Tauranga. It is also	

	Proposed RPS Provision(s)	Support / Oppose	Submission Detail	Relief Sought from Environment Waikato
			located on the North Island Main Trunk rail line.	
			Tuakau is expected to grow form a town of 3,200 people in 2004 to close to 6,000 by 2051. There is 116 hectares of industrial land available in Tuakau. The land has good accessibility to Auckland through both road and rail connections.	
42.	Table 6-3 Hierarchy of major commercial centres in the Future Proof area, page 6- 29.	Support	The inclusion of this table in the Proposed RPS is supported.	Retain.
43.	Glossary, definition of 'commercial development', page G-2.	Support	Having a definition for 'commercial development' is supported.	Retain.
44.	Glossary, definition of 'regionally significant infrastructure', j), page G-7.	Support	The FPIC supports the inclusion of the Hamilton International Airport as regionally significant infrastructure as it aligns with similar provisions in the Future Proof Strategy.	Retain.
45.	Glossary, definition of 'urban', page G-9.	Support	Having a definition for "urban" is supported	Retain.