

Plan Change 15 – Tuumata Private Plan Change

Summary of Submissions



Document: Plan Change 15 Tuumata Private Plan Change– Summary of Submissions
Date: June 2023
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Reader’s guide

This document is a summary of the 12 submissions received, including 3 submissions (submissions 10, 11 and 12) that were received and omitted in error from the original summary of submissions, and the relief sought/decision(s) requested on Plan Change 15 (PC15). This summary helps readers to see all the decisions requested by a specific submitter.

This summary is ordered in alphabetical order by the submitters surname or the name of the organisation.

In the summary, every submitter has been allocated a submitter number and each submission point is referenced by a unique number. This whole number (e.g. 1.3) is required to be referenced when you make a further submission.

EXAMPLE: Submission 1.3
 1 is the submitter number 3 is the submission point number

The formatting used in this summary generally identifies in the ‘Summary of Decision Sought’ column any additions requested with underlined font and deletions with ~~strike through~~ font.

How to make a further submission

The call for further submissions opens on 27 June 2023. The closing date for making further submissions is 10 July 2023.

People can make a further submission if they represent a relevant aspect of the public interest and/or have an interest in Private Plan Change 15 greater than the interest of the general public. A further submission can only be made in support or in opposition of matters raised in the submissions. No new points can be raised.

Further submissions should be set out in the format shown in the submission form. Copies of the further submission form are available at Council offices or Libraries as well as online at <https://hamilton.govt.nz/property-rates-and-building/district-plan/plan-changes/plan-change-15/>.

In accordance with the Resource Management Act 1991 a copy of the further submission must be sent to the person who made the original submission within five (5) working days of sending the further submission to Hamilton City Council. To assist you with this an address list of all submitters is included in this report. Submissions can be:

Emailed to haveyoursay@hcc.govt.nz

Posted to Hamilton City Council
Private Bag 3010
Hamilton 3204

Delivered to 260 Anglesea Street
Hamilton 3204

Submitter contact details

Submitter Number	Submitter (by surname)	Submitters Contact Details
1	Baker, Niall	niall.baker@hotmail.com
2	Chedworth Properties Limited	Jeremy Brabant Foundry Chambers, Level 4, Vulcan Building Chambers, Corner Queen Street and Vulcan Lane PO Box 1502, Shortland Street, Auckland jeremy@brabant.co.nz
3	Department of Conservation	Tom Christie (Planner) Department of Conservation, 253 Chadwick Road, PO Box 9003, Tauranga 3142 Tchristie@doc.govt.nz
4	Fairview Downs Residents and Owners Association	Deborah Fisher deborahfisher.hamilton.nz@gmail.com
5	Fire and Emergency New Zealand	Nicola Hine (Consultant) PO Box 448, Waikato Mail Centre nicola.hine@beca.com
6	Hamilton City Council	Mark Davey (City Planning Unit Manager) Hamilton City Council, Private Bag 3010, Hamilton 3204 mark.davey@hcc.govt.nz
7	Kāinga Ora – Homes and Communities	Brendon Ligget (Manager – Development Planning) Kāinga Ora – Homes and Communities, PO Box 74598, Greenlane, Auckland 1051 developmentplanning@kaingaora.govt.nz
8	Transpower New Zealand Limited	Rebecca Eng PO Box 17215, Greenlane, Auckland 1546 environment.policy@transpower.co.nz
9	Waikato Regional Council	Katrina Andrews (Strategic and Spatial Planning) Private Bag 3038, Waikato Mail Centre, Hamilton 3240 Katrina.Andrews@waikatoregion.govt.nz

Submitter Number	Submitter (by surname)	Submitters Contact Details
10	Ministry of Education	Sophie Andrews (Beca Ltd) 32 Harington Street, Tauranga 3110 sophie.andrews@beca.com
11	Tuhoro, Janie	4/24 Gibson Road, Dinsdale, Hamilton 3204 janietuhoro1234@gmail.com
12	Waikato Housing Initiative	Aksel Danger Bech 360 Tristram Street, Hamilton Central 3204 aksel@waikatohousinginitiative.org

Summary of submissions

Sub. No.	Submitter	Sub. point	Subject	Plan Provision / Topic	Oppose / Support	Summary of Submission	Summary of Decision Sought
1	Barker, Niall	1.1	Rezoning	Residential Open Space Business 6	Support	Support rezoning of site to Residential, Open Space and Neighbourhood Centre from an urban form perspective.	Support the rezoning of site.
1	Barker, Niall	1.2	Rezoning	Other	Support	Future industrial land should occur to the south as a logical extension to the existing industrial area.	Support future industrial land occurring to the south.
1	Barker, Niall	1.3	Rezoning	Open Space	Support	Support the retention of Ruakura Open Space zoned land on the northern and eastern edges of the Tuumata Block for stormwater management, visual amenity and to buffer proposed 'Major Arterial Transport Corridor'.	Support the retention of Ruakura Open Space zoned land on the northern and eastern edges of the Tuumata Block.
1	Barker, Niall	1.4	Parks and reserves		Support in part	Insufficient information has been provided to determine if sufficient open space through parks and reserves will be provided in the plan change.	Further consideration to the provision of sufficient park / reserve spaces within Tuumata block with both walking and cycling access provided to link Fairview Downs with Tuumata block.
1	Barker, Niall	1.5	Urban design	Walking and cycling connections	Support	Support proposed linkages to key existing walking and cycling facilities adjacent to the site connecting to the existing Wairere Drive shared path and future facilities proposed on the Spine Road / ETC and Fifth Ave Extension.	Support proposed linkages to key existing walking and cycling facilities adjacent to the site connecting to the existing Wairere Drive shared path and future facilities proposed on the Spine Road / ETC and Fifth Ave Extension.
1	Barker, Niall	1.6	Urban design	Walking and cycling connections	Support in part	Seek further consideration of walking and cycling connections to the existing Fairview Downs neighbourhood and the current Tuumata Rise development on Powell's Road. This will allow access to Raymond Park for Tuumata residents, and Fairview Downs residents to access shopping	Seek further consideration of walking and cycling connections to the existing Fairview Downs neighbourhood and the current Tuumata Rise development on Powell's Road.

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						facilities within the Tuumata Block without using Wairere Drive.	
1	Barker, Niall	1.7	Urban design	Walking and cycling connections	Support in part	Walking and cycling connections should be provided into Northholt / Hendon Road or other suitable locations, with linkages to Northholt Park and the wider Fairview Downs area.	Walking and cycling connections should be provided into Northholt / Hendon Road or other suitable locations, with linkages to Northholt Park and the wider Fairview Downs area.
1	Barker, Niall	1.8	Urban design	Road connections	Support in part	Further work should be done to join and integrate Fairview Downs with suburbs of Hamilton East to the south of Ruakura Road using a new local street network.	Further work should be done to join and integrate Fairview Downs with suburbs of Hamilton East to the south of Ruakura Road using a new local street network.
1	Barker, Niall	1.9	Urban design	Parking	Support in part	The plan change should consider and clarify any required parking provisions as this has implications for transportation modes and access.	The plan change should consider and clarify any required parking provisions.
1	Barker, Niall	1.10	Heritage / archaeology		Support in part	Further work should be undertaken to confirm the farming history of the area from the late 1800s to early 1900s.	The information on the historical land use from the previous hearings on the Ruakura Plan Change should be considered as part of this work to confirm the farming history of the area from the late 1800s to early 1900s.
1	Barker, Niall	1.11	National Grid		Support in part	Documentation from Transpower confirming that the HAM-MER-B 110kV line is to be disconnected in the future should be provided. This will impact on development across the proposed plan change site and within the Fairview Downs housing area.	Confirmation by Transpower of the proposal for the Hamilton Meremere B (HAM-MER-B) 110kV Double circuit transmission line.
1	Barker, Niall	1.12	Transport	Road trigger	Support	Support the proposed rules that ensure the plan change is staged in line with the provision of arterial roads within Tuumata beyond the initial 430-lot stage and to ensure alignment of the construction / operation of the ETC.	Support for proposed arterial road trigger for development beyond the initial 430-lot stage.

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1	Barker, Niall	1.13	Transport	Road connections	Support in part	For PC15 to be successful it is critical that any connectivity upgrades efficiently and effectively integrate with the surrounding area including Fairview Downs.	Request that if PC15 is rezoned that transport links on Wairere Drive, the ETC and Powell's Road are integrated with land uses to the north, including the suburb of Fairview Downs. The appropriate integration of any connectivity and servicing upgrades to the surrounding area, in particular Fairview Downs suburb.
1	Barker, Niall	1.14	Transport		Support in part	The ITA states that <i>Wairere Drive / Powells Road intersection operates with a poor level of service (irrespective of the plan change). There are options to improve the function of this intersection.</i>	Any proposed changes to the operation of the Wairere Drive / Powell's Road intersection should be fully consulted on with the Fairview Downs community.
1	Barker, Niall	1.15	Transport		Support in part	There is a need to ensure road users travelling to and from Fairview Downs and their travel routes are not affected until the ETC is completed. Question whether there are reasonable alternative routes e.g., via Carrs Road interchange, or use of Tramway Road to travel south and access the Wairere Drive/ Fifth Avenue roundabout, given the increasing demand this roundabout will face with the ETC link and Tuumata block development.	Any proposal to remove certain turning points needs to be thoroughly considered.
1	Barker, Niall	1.16	Transport	Road connections	Support in part	Further detail is needed as to how/if Fairview Downs connects with the ETC. Eastern end of Powell's Road been connected to the ETC at a roundabout is mentioned but not shown on the structure plan or master plan maps provided.	Further detail is needed as to how/if Fairview Downs connects with the ETC.
1	Barker, Niall	1.17	Transport		Support in part	The effects (including amenity) on the Fairview Downs community from any increased traffic volumes on Wairere Drive, Fifth Avenue	The effects (including amenity) on the Fairview Downs community from any increased traffic volumes on Wairere Drive, Fifth Avenue

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						Extension and the ETC need to be fully assessed and considered.	Extension and the ETC need to be fully assessed and considered.
2	Chedworth Properties Limited	2.1	Rezoning	Residential	Oppose	<p>Oppose the proposed rezoning of land from Industrial Park to General Residential as it undermines the core outcomes, vision and master planning for Ruakura and will decrease available employment land in Ruakura.</p> <p>The PC15 area is located within the operative Ruakura Structure Plan area.</p> <p>The Ruakura Structure Plan area provides 405ha of employment land incorporating an inland port, regional logistics hub, industrial park and other employment land. The Ruakura Structure Plan also provides for a level of medium density and general residential housing areas. The proposed plan change undermines the master planning of not only the Ruakura Structure Plan area, but also Hamilton as a whole.</p>	Decline PC15 in its entirety and retain the existing industrial zoning.
2	Chedworth Properties Limited	2.2	Rezoning	Business 6	Oppose	Opposes the proposed rezoning from Industrial Park to Business 6 to provide for a new neighbourhood centre. Neighbourhood centre areas are already provided for in the Ruakura Structure Plan. The provision of an additional centre will adversely impact the precinct hierarchy including the one Integrated Retail Development provided for in the Structure Plan and relevant DP provisions.	Decline PC15 in its entirety and retain the existing industrial zoning.
2	Chedworth Properties Limited	2.3	Rezoning	Knowledge Zone	Neutral	Is neutral to the proposed rezoning of the Council owned lane from Ruakura Industrial to Knowledge Zone. This is a correction to the zoning anomaly applying to the Council owned lane adjoining the area in the south.	None sought.

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2	Chedworth Properties Limited	2.4	Structure Plan		Oppose	Opposes the incorporation of a new precinct and structure plan for the Tuumata Residential Precinct as it will result in a reduction of employment land in Ruakura.	Decline PC15 in its entirety and retain the existing industrial zoning.
2	Chedworth Properties Limited	2.5	Provisions		Oppose	Opposes the inclusion of additional rules (through the Tuumata Residential Precinct) to implement the Medium Density Residential Standards for the land proposed to be rezoned to General Residential and subject to the proposed Tuumata Residential Precinct.	Decline PC15 in its entirety and retain the existing industrial zoning.
2	Chedworth Properties Limited	2.6	Transport	Climate change	Oppose	The changes enabled by PC15 will have significant adverse effects on traffic congestion particularly from 5 th Avenue to the central city. The changes enabled by PC15 will have significant adverse effects on increased greenhouse gas emissions from traffic congestion and greater travel distances to employment.	Decline PC15 in its entirety and retain the existing industrial zoning.
3	Department of Conservation	3.1	Ecology	Long-tailed bats	Oppose in part	Limited survey work has been undertaken to support the understanding of the current use of the site by long-tailed bats (present in the Hamilton area).	<ol style="list-style-type: none"> DOC submits that the proposed provisions for bats and bat habitat need to be strengthened to meet the direction of the WRPS, particularly Policies ECO-P1, ECO-P2, ECO-P3 and Methods ECO-M1, ECO-M2 and ECO-M13. The plan change includes requirements for the following as part of any consent application to develop the site: <ul style="list-style-type: none"> Detailed surveys of bat use of the site. Identification and protection of active bat roost trees and use of the Bat Recovery Group approved Roost Protection Protocol. Replanting of native trees to replace

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							<p>high and medium value potential roost trees to establish dark vegetated corridors to allow long-tailed bats to navigate through the landscape.</p> <ul style="list-style-type: none"> An ecological management plan to manage effects on bats and blackmudfish.
3	Department of Conservation	3.2	Ecology	Freshwater Habitat Loss Biodiversity Compensation Model	Oppose in part	<p>In addition, the waterways within the proposed plan change area are known to provide habitat for black mudfish. The assessment is lacking detail and certainly about how effects of permanent habitat loss will be appropriately mitigated or otherwise compensated. There is not enough detail to claim no net loss for black mudfish.</p> <p>The proposed plan change relies heavily on the Biodiversity Offsetting Accounting Model to address effects upon <i>black mudfish</i> and is of concern for DOC given the concerns / limitations of the model described above.</p>	<p>The plan change includes requirements for the following as part of any consent application to develop the site:</p> <ul style="list-style-type: none"> An ecological management plan to manage effects on bats and blackmudfish. The use of an accepted quantitative Biodiversity Offsetting Accounting Model.
4	Fairview Downs Residents and Owners Association	4.1	Rezoning	Residential	Support	<p>Fairview Downs Residents and Owners Association support the re-zoning of Industrial Land within the Ruakura Structure Plan to Residential.</p>	Retain
4	Fairview Downs Residents and Owners Association	4.2	Parks and reserves		New	<p>There does not appear to be sufficient open space allowed within the Tuumata development for parks and playgrounds that will need to cater for upwards of 3,000 residents.</p>	<p>We request that a playing field, pocket parks and playgrounds be included within this development.</p>

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4	Fairview Downs Residents and Owners Association	4.3	Transport	Walking and cycling connections	New	<p>We would like further consideration to be given to walking and cycling connections to Fairview Downs to enable access to Raymond Park from Tuumata and for Fairview Downs residents to access the Tuumata shopping centre.</p> <p>Concerns around safety have been raised over walking/cycling paths being placed directly behind/adjacent to existing properties.</p>	We request the path behind Northolt Road be placed further from properties and consultation be undertaken with affected properties.
4	Fairview Downs Residents and Owners Association	4.4	Transport	Road connections	Oppose	<p>There are concerns on how this development will impact traffic within and access to Fairview Downs.</p> <p>It is noted that PC15 now connects the eastern end of Powells Road to the ETC/Webb Drive/Spine Road and while another access route in and out of the area is appreciated, the original Ruakura Structure Plan did not have this connection as it was believed that vehicles would use Powells Road as a shortcut to the Industrial area to the east rather than the Fifth Avenue Extension.</p> <p>Although not part of PC15 the development of Tuumata Rise at the eastern end of Powells Road has raised concerns that the intersection at Wairere Drive and Powells Road may be altered, initial information on this development showed an altered intersection with no access to Tramway Road.</p>	<p>We point out that much of the current and historic social connections with Fairview Downs are to the West in Enderly, Fairfield and Chartwell.</p> <p>Any alteration to access in and out of Fairview Downs needs to take this into account and any traffic implications.</p>
5	Fire and Emergency New Zealand	5.1	Provisions	Transport Policy 3.7.3.13f	Support in part	<p>Fire and Emergency support Policy 3.7.3.13f to the extent that Fire and Emergency recognise the need to prioritise the movement of pedestrians and cyclists, but request acknowledgement that</p>	<p>Amend as follows: 3.7.3.13f The transport network shall prioritise the movement of pedestrians and cyclists over</p>

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						<p>emergency service vehicles need to be appropriately accommodated and prioritised. Fire and Emergency request recognition in this policy in this regard.</p> <p>Fire and Emergency also recognise the intent of 3.7.3.13.f(vi) providing a continuous tree canopy along transport corridors and the benefits of this in the urban environment, but request that care needs to be given to any specimen selection for roadside landscaping, as main trunk or upper over hanging branches of trees, once established, can prevent access by fire appliances (and other heavy vehicles such as rubbish trucks and moving trucks) particularly down the narrower local roads and rear lanes. This would help to ensure that the Ruakura-Tuumata development achieves the outcomes anticipated in objective 3.7.3.12 being a well- functioning urban environment that is integrated.</p>	<p>vehicles, incorporate the principles of CPTED, and provide;</p> <p>[...]</p> <p><u>vii. A transport network that provides for and accommodates emergency service access and operations.</u></p>
5	Fire and Emergency New Zealand	5.2	Provisions	Residential Zones Objective 4.2.16	Support	<p>Fire and Emergency support new objective 4.2.16 to the extent that it requires development in the Tuumata Residential Precinct to be undertaken in a manner to ensure a well-functioning urban environment and is coordinated with the provision of infrastructure and services.</p> <p>It is paramount for Fire and Emergency that development is coordinated with the delivery of the transport network and an adequate reticulated water supply network sufficient for firefighting.</p>	Retain as notified.

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5	Fire and Emergency New Zealand	5.3	Provisions	Residential Zones Policy 4.2.16b	Support	Fire and Emergency support new Policy 4.2.16b. This supports three waters and transport infrastructure. This would include an adequate reticulated water supply network sufficient for firefighting.	Retain as notified.
5	Fire and Emergency New Zealand	5.4	Provisions	Policy 4.2.17a	Support in part	The Fire and Emergency support Policy 4.2.17a highlights the significance of a well-functioning residential precinct. Additionally, it emphasizes the necessity for all residential units and resident development to have suitable access for emergency services.	Amend as follows: 4.2.17a All residential units and residential development shall have: [...] <u>ix. adequate provision of emergency service access.</u>
5	Fire and Emergency New Zealand	5.5	Provisions	Building setbacks Rule 4.15.6.c-d, f	Oppose	<p>Fire and Emergency opposes Rule 4.15.6.c-d due to concerns that the proposed minimum side and rear yard building setbacks of 1m in the Tuumata Residential Precinct could heighten the risk of fire spread, hinder emergency personnel from reaching the fire source.</p> <p>Fire and Emergency opposes Rule 4.15.6 f, as it allows for potential reduction in minimum setbacks, which could result in poor urban design and hinder physical access for emergency personnel, suggesting that non-compliance with reduced setbacks should require resource consent for appropriate risk assessment by the Hamilton City Council.</p> <p>Fire and Emergency recognise that TGH seek to incorporate design standards reflective of Medium Density Residential Standard but to retain the General Residential Zone performance standards for the new Tuumata Residential</p>	<p>1. Add advice note to Rule 4.15.6 as follows: <u>Advice note:</u> <u>Building setback requirements are further controlled by the Building Code. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p> <p>2. Delete Rule 4.15.6f. f. Side and rear yard setbacks may be reduced where, i. The written consent of the owners adjoining the relevant setback or setbacks is obtained; or ii. It is proposed to site a building within the 1m setback and;</p>

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						<p>Precinct. Fire and Emergency request that careful consideration is given to in the application of 1m setbacks in this urban environment.</p> <p>Fire and Emergency therefore request that, as a minimum, an advice note is included with Rule 4.15.6 directing plan users to the requirements of the New Zealand Building Code.</p>	<p>a. The building is less than 10m² in area; and b. The building is less than 2m in height; and c. The building will not be connected to electricity supply; and d. There is no discharge of stormwater onto neighbouring land from the building; and e. No more than one building is established on a site in accordance with this rule; except where notional boundaries are shown for an approved subdivision, one accessory building can exist for each notional lot.</p>
5	Fire and Emergency New Zealand	5.6	Provisions	Building setbacks Rule 4.15.6.g	Support	<p>Fire and Emergency support Rule 4.15.6.g to the extent that no part of a building(including eaves) shall extend over or encroach into an internal vehicle access. Further support Rule 4.15.6.h where a 1m setback of residential units from an internal vehicle access is required.</p>	Retain as notified.
5	Fire and Emergency New Zealand	5.7	Provisions	Public Interface Rule 4.15.8(c)	Support in part	<p>Fire and Emergency support Rule 4.15.8(c) to the extent that all residential developments in Tuumata residential terrace dwellings and Tuumata residential apartment dwellings must have pedestrian access from a transport corridor to the front door of each residential unit, or to the single front door and lobby of an apartment building. However, this support is subject to the required pedestrian access not being the only access (i.e. pedestrian only developments with no on-site vehicle access).</p> <p>To support effective and efficient access and manoeuvring of crew and equipment for</p>	<p>Retain as notified, subject to confirmation of the application of Rule 4.15.8(c).</p> <p>If pedestrian only development is intended to be enabled within the Tuumata Residential Precinct, FENZ request that the below minimum requirements are incorporated as part of PC15.</p> <ul style="list-style-type: none"> • pedestrian accessways are designed to be clear and unobstructed, • pedestrian accessways have a minimum width of: <ul style="list-style-type: none"> ○ 3m on a straight accessway. ○ 6.2m on a curved or cornered accessway, ○ 4.5m space to position the ladder and

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						<p>firefighting Fire and Emergency require:</p> <ul style="list-style-type: none"> pedestrian accessways are designed to be clear and unobstructed, pedestrian accessways have a minimum width of: <ul style="list-style-type: none"> 3m on a straight accessway. 6.2m on a curved or cornered accessway, 4.5m space to position the ladder and perform operational tasks. wayfinding for different properties on a development are clear in day and night developments give effect to the guidance provided in Fire and Emergency's 'Designer's Guide' to Firefighting Operations Emergency Vehicle Access' <p>If pedestrian only development is intended to be enabled within the Tuumata Residential Precinct, FENZ request that the above minimum requirements are incorporated as part of PC15.</p>	<p>perform operational tasks.</p> <ul style="list-style-type: none"> wayfinding for different properties on a development are clear in day and night developments give effect to the guidance provided in Fire and Emergency's 'Designer's Guide' to Firefighting Operations Emergency Vehicle Access'
5	Fire and Emergency New Zealand	5.8	Provisions	Obj and Pol Subdivision Objective 23.2.8	Support in part	Fire and Emergency support Objective 23.2.8 to the extent that the expectation is that subdivision contributes to a well-functioning urban environment that is generally consistent with the Ruakura -Tuumata Structure Plan on Figure 2-14A Ruakura - Tuumata Structure Plan and Figure 2-14B Transport Corridor Cross Sections.	<p>Retain Objective 23.2.8 as notified.</p> <p>As indicated in this submission, FENZ are generally supportive of the indicative cross sections set out in Figure 2-14B <i>however request amendment to the cross-section figures for 'C', 'C2', and 'C3' to indicate a minimum total carriageway width of 6m, with minimum 3m wide drive lanes.</i></p>
5	Fire and Emergency New Zealand	5.9	Provisions	Obj and Pol Subdivision Policy 23.2.8b	Support in part	Fire and Emergency support Policy 23.2.8b to the extent that the policy seeks a safe urban environment that minimises the creation of rear lots and cul-de-sacs.	<p>Amend as follows:</p> <p>23.2.8b Enable safe and attractive urban environment with a high level of amenity by:</p>

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						This policy also enables the provision of rear lots. Fire and Emergency request an amendment to this policy requiring the provision for adequate emergency service access as this is an imperative component of enabling a safe urban environment.	[...] <u>viii. Providing adequate emergency service access.</u>
5	Fire and Emergency New Zealand	5.10	Provisions	Obj and Pol Subdivision Policy 23.2.8c	Support in part	Fire and Emergency support Policy 23.2.8c to the extent that 23.2.3c(iii) requires the provision for on-street parking in recessed parking bays to ensure carriageways are kept clear from parked cars so that Fire and Emergency are able to traverse the corridor but also operate from the road, if required.	Retain as notified.
5	Fire and Emergency New Zealand	5.11	Provisions	Obj and Pol Subdivision Policy 23.2.8e	Support in part	<p>Fire and Emergency support Policy 23.2.8e to the extent that rear lanes are to be designed to be limited in length, to create low vehicle speeds, provide for the safety of users and make walking and cycling more attractive by minimising trip lengths.</p> <p>Limiting the length of rear lanes is also of benefit to Fire and Emergency during emergency response as it means fire appliances do not have to traverse long rear lanes to get to an emergency i.e. structure fire.</p> <p>Fire and Emergency are more likely to be able to operate from the road hard standing where rear lanes do not exceed hose run of 75m. However, Fire and Emergency prefer to operate as close as possible (within 20m as per the New Zealand Building Code), providing for emergency vehicle</p>	Retain as notified.

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						access in accordance with SNZ PAS 4509:2008 and the Firefighting Operations Emergency Vehicle Access Guide (F5-02 GD) is paramount.	
5	Fire and Emergency New Zealand	5.12	Provisions	Transport corridor boundary length Rule 23.7.9.a	Support	Fire and Emergency support Rule 23.7.9.a where the minimum transport corridor boundary length is 10m for vacant fee simple residential lots.	Retain as notified.
5	Fire and Emergency New Zealand	5.13	Provisions	Roading and access Rule 23.7.9.c(i) and (iii)	Support in part	<p>Fire and Emergency support Rule 23.7.9.c(i) that require a 7m minimum legal width for a two-way rear lane which will accommodate a fire appliance.</p> <p>Fire and Emergency further support Rule 23.7.9.c(iii) whereby each land shall be designed to provide access and egress for large rigid trucks such as fire trucks.</p> <p>Fire and Emergency further support Rule 23.7.9.c(iii)(b) that requires rear lanes to be connected to the transport corridor at each end.</p> <p>Rule 23.7.9.c(iii)(c) is also important as rear lanes need to remain clear of obstruction (such as illegally parked cars) so that Fire and Emergency can quickly get to site of the emergency.</p> <p>In order for plan users to demonstrate compliance with Rule 23.7.9.c(iii) relating to emergency service access, Fire and Emergency request an advice note that directs plan users to consider that specific reference should be made to SNZ PAS 4509:2008 and the Firefighting Operations Emergency Vehicle Access Guide (F5-02 GD) in the form of an advice note to direct plan users as the relevant documents that will enable them to</p>	Add new advice note to Rule 23.7.7c(iii): <u>Refer to the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008) and the Designers' guide to firefighting operations Emergency vehicle access F5-02 GD to ensure adequate provision is made for firetruck access and egress.</u>

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						demonstrate how compliance can be achieved in relationthe fire appliance access and egress.	
5	Fire and Emergency New Zealand	5.14	Three waters	New	New	<p>Fire and Emergency recognise that it is the intent that subdivision consents for the Ruakura -Tuumata Structure Plan area are expected to further refine the three waters infrastructure needs in accordance with Figures 2-15A and B Ruakura Strategic Infrastructure (Three waters).</p> <p>Fire and Emergency request that Council do not enable development within the Ruakura-Tuumata Structure Plan area unless it is matched with the delivery of keywater strategic infrastructure.</p> <p>As indicated in the Infrastructure Report provided with the application, the water supply has been assessed in accordance with SNZ PAS 4509:2008.The Infrastructure Report classifies firefighting water demand to FW2 to meet the water supply classification for the proposed residential area and concludes that the water supply system will be designed to provide sufficient pressure and flows for the development to comply with FW2. However, Fire and Emergency note that FW3 isrequired for non-residential which would include the Neighbourhood Centre.</p> <p>Fire and Emergency therefore seek clarification from the applicant as to what fire demand will be provided for the Neighbourhood Centre.</p>	<p>Add new rule as follows:</p> <p>25.13 Three Waters</p> <p>25.13.4.4 Water</p> <p>...</p> <p><u>f. Where any subdivision or development results in additional allotments or buildingswithin the Ruakura-Tuumata Structure Plan area, provision for sufficient firefighting water supply must be provided in accordance withthe New Zealand Fire Service Firefighting Water Supply Code of Practice (SNZ PAS 4509:2008).</u></p> <p>Alternatively, an amendment to the information requirements for Water Impact Assessments be amended toinclude the following:</p> <p>25.13.4.6 Water Impact Assessments</p> <p>a. A Water Impact Assessment, asdescribed in Volume 2, Appendix 1.2.2.5, is required for any development or subdivision:</p> <p>[...]</p> <p><u>viii. within the Ruakura-TuumataStructure Plan area</u></p> <p>1.2.2.5 Water Impact AssessmentsTable 1.2.2.5a:</p> <p>Information required for each type ofWater Impact Assessment</p> <p>[...]</p> <p><u>xi. Where any subdivision or development is to occur in the Ruakura-Tuumata Structure Plan</u></p>

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						Fire and Emergency seek a specific rule in the district plan via PC15 requiring all subdivision and development in the Ruakura-Tuumata Structure Plan area to demonstrate compliance in accordance with SNZ PAS 4509:2008. This would include the provision of additional supply over and above what is provided via the reticulated network where a higher level of service is required or where it is determined that there is insufficient capacity in the water supply network at the time of development.	<u>area, confirmation that there is sufficient firefighting water supply capacity in the network that is compliant with the New Zealand Fire Service Firefighting Water Supply Code of Practice (SNZ PAS 4509:2008)</u>
5	Fire and Emergency New Zealand	5.15	Provisions	Assessment Criteria 1.3.3 N15	Support in part	<p>Fire and Emergency support the direction of N15 (N15 - Ruakura – Tuumata Structure Plan Subdivision). Fire and Emergency request that explicit consideration is given as to whether the subdivision provides for a comprehensive and connected transport network which incorporates as necessary, the design of the transport network that is accessible for emergency services.</p> <p>There are a number of locations where Fire and Emergency’s relief could be incorporated into the existing matters of discretions set out (b)-(m), therefore suggested wording has been provided to meet Fire and Emergency’s requested relief.</p>	<p>Amend as follows:</p> <p>N15 Ruakura- Tuumata Structure Plan – Subdivision</p> <p>[...]</p> <p>b. Whether the subdivision provides for a comprehensive and connected Open Space and transport network which incorporates as necessary:</p> <p>[...]</p> <p><u>xiv. The extent to which the transport network and where rear lanes are required for vehicle access, are accessible for emergency services and compliant with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS4509:2008 (SNZ PAS 4509:2008) and the Designers’ guide to firefighting operations Emergency vehicle access F5-02 GD.</u></p>

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5	Fire and Emergency New Zealand	5.16	Provisions	Assessment Criteria 1.3.3 N16 c.	Support in part	Fire and Emergency support the direction of N16. Fire and Emergency however request that explicit consideration is given to whether the Neighbourhood Centre is designed to accommodate for emergency service access and operations.	Amend as follows: 1.3.3 N16 c. The extent to which the streetscape and road corridors have been designed to: [...] <u>vi. Be accessible for emergency services and compliant with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008) and the Designers' guide to firefighting operations Emergency vehicle access F5-02 GD.</u>
5	Fire and Emergency New Zealand	5.17	Provisions	Manoeuvring 1.3.3 N17	Support in part	Fire and Emergency support the direction of N17. Fire and Emergency however request that explicit consideration is given to whether the site layout and design of the Tuumata Structure Plan area accommodates emergency service access and operations. Fire and Emergency support N17(d) which requires a determination as to whether Tuumata residential terrace dwellings and Tuumata residential apartment dwellings: <ul style="list-style-type: none">• Provides clear, convenient and safe access for all modes of transport through the site.• Has been designed to accommodate manoeuvring of large rigid trucks such as fire appliances within the transport corridor.• Where utilising rear lanes, the extent to which the lane is designed to accommodate the passage of large rigid trucks such as fire	Amend N17 as follows: Context a. Whether the proposal: [...] v. <u>Has been designed in a manner that supports the movement of emergency service vehicles and enhances pedestrian and cycle movements, including access to the transport network</u>

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						appliance (where these are proposed to enter the rear lane).	
5	Fire and Emergency New Zealand	5.18	Provisions	A – General Criteria	Oppose	<p>Fire and Emergency understand that A – General Criteria will set out matters of discretion for residential units where they infringe one or more of the standards applicable to the Tuumata Residential Precinct</p> <p>This is not subject to amendment through PC15 however Fire and Emergency request that an additional matter of discretion be introduced that requires developers and Council to assess the extent of non-compliance with the rear and side yard setbacks introduced through PPC15.</p> <p>This will provide Council discretion to assess the extent of risk to people, property, the environment and emergency response (including firefighter safety) as a result of non-compliance with the required minimum setbacks.</p>	<p>Add new matter of discretion specific to the Tuumata Residential Precinct:</p> <p><u>Tuumata Residential Precinct</u></p> <p><u>a. The extent to which the proposed rear, side or front setback will enable emergency service accessor egress, including the movement of residents in a fire or natural hazard emergency</u></p>
5	Fire and Emergency New Zealand	5.19	Figures	Figure 2-14B	Support in part	<p>Fire and Emergency request that the Figure 2-14B cross sections for Transport Corridors labelled 'C', 'C2', and 'C3' are amended to indicate drive lanes of no less than 3m to provide a total carriageway width of no less than 6m to facilitate fire appliance operations.</p> <p>This is in keeping with Table 15-6a)ii, Volume 2, Appendix 15: Transportation of the Hamilton City Operative District Plan, which sets out the criteria for the form of Transport Corridors, which requires a minimum carriageway width of 6m for Local Roads.</p>	Amend Figure 2-14B to reflect a minimum 6-metre-wide total carriageway width, comprising 3m for each lane, for Transport Corridors labelled 'C', 'C2', and 'C3'.

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6	Hamilton City Council	6.1	Rezoning	Residential	Support in part	<p>The Private Plan Change proposes to change the zoning of the majority of the site from Industrial to Residential (Tuumata), to allow for Medium Density residential development on the site.</p> <p>The operative Industrial Zoning of the site was confirmed during the Ruakura Board of Inquiry process, and in part was relied upon at the time to justify the approval of the then Ruakura Plan Change and its contribution to long term industrial land supply in Hamilton.</p> <p>It is important that before the change in zoning to Residential can be accepted, that all the potential economic implications of the change are appropriately considered, including effects on industrial land supply and the opportunity cost imposed on industries associated with the proposed zoning change.</p> <p>In that regard, Hamilton City Council is concerned that the Centres Viability Assessment and Industrial Land Supply Report provided with the Proposed</p> <p>Plan Change includes only limited use of data and does not provide an appropriately comprehensive assessment framework for the analysis of the potential direct and indirect economic effects of the Proposed Plan Change commensurate with the size and scale of the change proposal. This is particularly important for the analysis of the industrial land conversion to residential and the long terms economic costs versus benefits.</p>	<ol style="list-style-type: none"> 1. Accept the Residential zoning of the site, subject to sufficient evidence being provided that the change in zoning will not give rise to unacceptable direct and indirect economic effects to the Hamilton economy and industrial land provision. This needs to include a comprehensive assessment of the costs and benefits to Hamilton and sub-regional economy from the potential loss of this industrial land supply and the costs (including time) to substitute this loss of industrial land with industrial supply elsewhere. 2. Update the Ruakura Structure Plan based on the decisions made regarding PC15.

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6	Hamilton City Council	6.2	Rezoning	Business 6	Oppose	<p>The Private Plan Change proposes to change the zoning of approximately 2ha of the site from Industrial to Business 6 (Neighbourhood Centre) Zone, with a specific provision for a supermarket of up to 3,500m² in Gross Floor Area as a Discretionary Activity.</p> <p>It is important that before the change in zoning to Business 6 (Neighbourhood Centre) can be accepted, that all the potential implications of the change on the retail hierarchy in Hamilton are considered.</p> <p>In that regard, Hamilton City Council is concerned that the Centres Viability Assessment and Industrial Land Supply Report provided with the Private Plan Change does not provide an appropriately comprehensive assessment and analysis of the potential effects of the proposed Business 6 (Neighbourhood Centre) Zone in Tuumata on the centres hierarchy.</p>	Decline the inclusion of the Neighbourhood Centre provisions in their current form, unless it can be demonstrated that provision of the Neighbourhood Centre (including the specific supermarket GFA provision sought) will not adversely affect the viability of other existing, consented but not yet developed, or plan enabled retail centres including but not limited to the centres of Five Cross Roads, Pardoia Boulevard, and Greenhill Park and the centres identified in the Ruakura Structure Plan.
6	Hamilton City Council	6.3	Urban design	Preliminary Development Concept Master Plan Neighbourhood Centre Layout	Support in part	<p>The indicative layout of the Neighbourhood Centre as shown on the Structure Plan is not supported from an urban design point of view for a variety of reasons. It would be more appropriate for an urban design framework/set of design principles for the neighbourhood centre to be included to provide guidance on how the future development of the Neighbourhood Centre could occur.</p> <p>The location of the neighbourhood centre within the site should maximise walkability for the PC15 residential area.</p>	<p>If the Business 6 Zone Neighbourhood Centre zoning is retained:</p> <ol style="list-style-type: none"> 1. Remove the indicative layout from the Neighbourhood Centre Zone as shown on the Structure Plan. 2. Include an urban design framework/principles for the Neighbourhood Centre with supporting objectives, policies and rules. 3. Better integrate the neighbourhood centre with the site. 4. Undertake an urban design assessment of the proposed node-based neighbourhood

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						<p>The proposed neighbourhood area is significantly larger than other Neighbourhood centres in Hamilton.</p> <p>The applicant needs to demonstrate that the outcomes proposed, with the exception of the supermarket, will be consistent with other neighbourhood centre zones or provide information why it is appropriate that it is not consistent.</p> <p>The urban design benefits for the inclusion of a supermarket and drive through facilities are not clear.</p>	<p>centre approach and how this aligns with other neighbourhood centres as well as the zone outcomes anticipated for neighbourhood centre zones.</p> <p>5. Further information and urban design assessment is sought to address the benefits/effects of the proposed plan provisions. e.g., Inclusion of supermarket and drive-through facilities. We are unclear of the rationale of why a neighbourhood centre requires drive-through facilities.</p> <p>6. Provide further information and demonstration that the size, shape, and location of the proposed Neighbourhood centre, including the proposed plan provisions, will enable best practice urban design outcomes stated.</p>
6	Hamilton City Council	6.4	Urban Design	<p>Preliminary Development Concept Master Plan</p> <p>Interface with stormwater infrastructure and recreational open space areas.</p>	Support in part	<p>The Preliminary Development Concept Master Plan supplied for the Plan Change site shows an extensive network of stormwater treatment swales and wetlands on the site, along with the provision of a central neighbourhood recreation park. While the provision of such stormwater and recreation infrastructure is supported, there is an absence in the Plan Change of any provisions to address the interface of adjoining and adjacent residential development with the stormwater and recreation areas.</p> <p>For example, a large stormwater treatment wetland is allowed for along most of the frontage of the site with Wairere Drive. The Master Plan also shows residential development immediately adjoining the stormwater device, which will</p>	<ol style="list-style-type: none"> 1. Amend the Preliminary Development Concept Master Plan to show a local road along the boundary with the stormwater treatment area fronting Wairere Drive. 2. Include specific objectives and policies regarding the dual activity function of the wetland. 3. Ensure sufficient setbacks are allowed for to enable active and passive recreation surrounding the stormwater pond. 4. Include objectives, policies, rules, and assessment criteria to address the interface of residential development with stormwater and recreation open space areas to be developed on the site.

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						mean the device will adjoin the rear of residential sites. In turn, this will lead to sub-optimal urban design outcomes from the residential development turning its back on the large area containing the stormwater device through the inevitable fencing of the boundary that will occur. Better urban design outcomes will be produced by placing a local road along the boundary with the stormwater device, thus creating a 20m separation between residential development and the device and allowing for the road facing residential development to also overlook the device.	
6	Hamilton City Council	6.5	Urban Design	Preliminary Development Concept Master Plan Street-block layout.	Support in part	<p>The proposed structure plan and Master Plan enables a high level of double frontage lots. There is no information provided how this will be managed nor what if any plan provisions are proposed or utilised that will ensure best practice urban design outcomes.</p> <p>The structure plan enables a higher degree of certainty of urban block outcomes than otherwise possible. It also creates challenges if any deviation needs to occur to unforeseen circumstances that were not evident at the plan change stage. No information has been provided nor direction to any plan provisions that would suitably manage this.</p>	<ol style="list-style-type: none"> 1. Include planning provisions which address how the street block arrangement manages outcomes such as the avoidance of or management of double frontage lots. 2. Address through new objectives and policies and/or alternate assessment criteria how deviation from the Structure plan can be managed to improve urban outcomes not readily apparent at this level.
6	Hamilton City Council	6.6	Urban Design	Subdivision: Vacant lots.	Support in part	The plan provisions enable a vacant lot subdivision to occur across the entire site area. A demonstration of this outcome and its assessment by the applicant is required.	If minimum vacant lot sizes are being used to manage density due to the effects on infrastructure, then Hamilton City Council seek an alternate management regime. We seek a net density target instead.

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						<p>We question if such a development outcome is appropriate and consistent with the zone provisions.</p> <p>The baseline of 300m² vacant lot development as enabled by the plan provisions could lead to poor urban design outcomes</p>	
6	Hamilton City Council	6.7	Urban Design	Development yield	Support in part	<p>There is discussion regarding how the proposed zone will facilitate a mixed housing environment but there is no information of plan provisions provided to show how mixed housing could be distributed across the site and an assessment of the urban design outcomes and benefits thereof.</p>	<p>Provide more detailed plan provisions addressing the distribution of house/lot typologies across the site to ensure good urban design outcomes are achieved and medium density typologies are realised.</p>
6	Hamilton City Council	6.8	Transport	Preliminary Development Concept Master Plan Unformed road link to Wairere Drive.	Oppose	<p>A roading link to Wairere Drive is shown on the Preliminary Development Concept Master Plan as unformed Road. Given the major arterial status of Wairere Drive and the proximity of the 5th Avenue/Wairere Drive intersection it is extremely unlikely that such a link would be approved in the future. Accordingly, the Unformed Road link should be removed from the Structure Plan.</p>	<p>Delete the unformed road link to Wairere Drive as shown on the Preliminary Development Concept Master Plan.</p>
6	Hamilton City Council	6.9	Transport	Road connections Fifth Avenue Extension	Support	<p>The Preliminary Development Concept Master Plan shows one roading connection from the Tuumata site to the Fifth Avenue Extension. Hamilton City Council supports this single access point approach in order to manage traffic safety and efficiency on the future Fifth Avenue extension</p>	<p>Retain the single roading connection to the Fifth Avenue Extension as shown on the Preliminary Development Concept Master Plan.</p>
6	Hamilton City Council	6.10	Transport	Road connections Fairview Downs	Support in part	<p>The Ruakura Structure Plan and current zoning anticipated industrial activities occurring on this site and therefore limited integration with the</p>	<p>1. Identify on the Preliminary Development Concept Master Plan a linkage to Fairview Downs in the north.</p>

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						<p>surrounding residential areas were anticipated or accommodated for in the plan provisions and structure plan layout. Given the change in zoning to residential being sought, greater integration with surrounding land uses is required.</p> <p>This integration will provide for improved accessibility and movement. It will improve the accessibility for residents to amenities, including the neighbourhood centre, park and existing and potential future schools.</p>	<ol style="list-style-type: none"> 2. Include objectives, policies and rules requiring the site to integrate with complementary surrounding land uses. 3. Specifically include a rule that requires, prior to the completion of the Fifth Avenue Extension, that a walking-cycling and vehicular linkage is provided for into Fairview Downs.
6	Hamilton City Council	6.11	Transport	Figure 2-14B Objectives and Policies Provisions	Support in part	<p>Cross-sections for Roads and Streets are provided with specific dimensions.</p> <p>Providing the dimensions within the plan provisions removes flexibility for both the applicant the Hamilton City Council to efficiently design and approve future detailed design plans that may for sound reasons deviate from the dimensions.</p> <p>Accordingly, it would be more efficient for the dimensions to be removed from the cross-sections and replaced by annotations specifying desired outcomes for each class of street/road (for example, specifying that the street is to provide two vehicle lanes, and a shared use walking and cycling path).</p>	<ol style="list-style-type: none"> 1. Remove the dimensions from the roading cross-sections shown in Figure 2-14B and replace them with annotations of the desired outcomes for each status of street/road. 2. Ensure that the relevant objectives and policies in the Proposed Plan Change provide adequate linkages to the roading cross-sections. 3. Ensure design controls respond to the relevant streetscape layout. This includes but not limited to the building line relative to the street, the continuity of building line, the orientation of buildings and front doors to the street, the building mass (height and width) relative to the street.
6	Hamilton City Council	6.12	Transport	Rule 3.7.4.3.6	Support in part	<p>This rule in part provides a limit (430) on the number of residential lots or units that can be established at the Tuumata site prior to the construction and operation of the Fifth Ave extension connecting to the Eastern Transport Corridor (ETC). The rule also prevents the establishment of any new buildings in the</p>	<p>Accept Rule 3.7.4.3.6 (i) and (ii) subject to the deletion of reference to <i>"a single temporary café not exceeding 100m²"</i> in clause (ii).</p>

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						<p>Business 6 Neighbourhood Centre Zone prior to the construction and operation of the Fifth Ave extension connecting to the ETC with the exception of events and sales/activation related buildings. The exceptions include <i>“a single temporary café not exceeding 100m² in area”</i>.</p> <p>This rule is important to manage the traffic effects of the progressive development of the site on the existing transportation network, and recognises the capacity limitations that exist at the adjacent Wairere Drive/Fifth Avenue roundabout until such time as the ETC to the immediate east of the site is constructed and operational.</p> <p>Accordingly, Hamilton City Council supports retention of the rule but is concerned that the traffic effects of the café exception have not been explicitly assessed in the Integrated Transport Assessment provided with the Proposed Plan Change.</p>	
6	Hamilton City Council	6.13	Three Waters	Sub-Catchment ICMP	Support in part	<p>The sub-catchment ICMP that supports the Plan Change has an inappropriately narrow extent of assessment and does not adequately assess the likelihood or magnitude of effects from stormwater discharges from the site on the downstream receiving environment. In order to be fully comprehensive, it should address downstream effects and propose provisions to address those effects.</p> <p>In addition to the above, insufficient options assessment has been undertaken to identify appropriate stormwater management approaches for upstream areas of the sub-</p>	<ol style="list-style-type: none"> 1. That the Sub-Catchment ICMP be amended to also assess effects of stormwater discharge from development on the plan change site on downstream receiving environments. 2. That the sub-catchment ICMP be amended to assess Best Practicable Options (BPOs) for upstream areas within the sub-catchment. 3. Include any amendments to the Plan Change provisions that are consequential from the downstream assessment sought in relief points 1. and 2. above

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						catchment. Of particular concern is the proposal to re-direct secondary flows from the eastern external catchment into the existing municipal reticulation network.	
6	Hamilton City Council	6.14	Three Waters	Sub-Catchment ICMP Stormwater Management Report	Support in part	The runoff modelling documented in the Stormwater Management Report utilises a different methodology to that recommended in WRC guidance and RITS. This could result in differences in infrastructure requirements.	That the sub-catchment ICMP be amended to demonstrate consistency between the adopted runoff modelling approach and that documented in the relevant WRC guidance (TR20-06).
6	Hamilton City Council	6.15	Three Waters	Sub-Catchment ICMP	Support in part	The proposed provisions as part of as notified Plan Change 12 require some level of onsite retention of stormwater. At a minimum this would require provision of rainwater reuse tanks. No retention is currently proposed. It is also noted that WRC also require a minimum retention requirement of the Initial Abstraction volume	That the sub-catchment ICMP be amended to be consistent with the retention requirements in the Proposed Plan Change 12 provisions.
6	Hamilton City Council	6.16	Three Waters	Sub-Catchment ICMP Stormwater Management Report	Support in part	The Stormwater Management Report indicates that the proposed constructed wetland could experience long durations of elevated water levels (refer Figure 17). Frequent elevated water levels can affect wetland plant health.	That the sub-catchment ICMP and associated Stormwater Management Report be updated to demonstrate that frequency and duration of inundation of the constructed wetland will not affect plant health.
6	Hamilton City Council	6.17	Three Waters	Sub-Catchment ICMP Stormwater Management Report	Support in part	Currently no defined engineered secondary flow paths exist downstream of the plan change area. There is concern that there could be effects on downstream properties in a primary network failure scenario. RITS requires functional OLFPs in a primary.	That the sub-catchment ICMP and associated Stormwater Management Report be updated to include a quantitative assessment of impacts to downstream overland flow paths under a primary system blockage event.

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6	Hamilton City Council	6.18	Integration with Plan Change 12	The format and content of the rules in the Private Plan Change with regards to development density and bulk and location	Support in part	<p>The content of the rules concerning density and bulk and location in the Tuumata Residential Zone have been modelled for consistency purposes on the as-notified provisions of Proposed Plan Change 12 to the Hamilton City District Plan.</p> <p>Should the PC12 provisions be subject to change through the submissions and hearing process, then it would be appropriate for the relevant PC15 provisions to be amended to remain consistent with the remainder of the District Plan.</p>	That any necessary amendments are made to the Private Plan Change 15 provisions to ensure consistency with Proposed Plan Change 12 provisions.
6	Hamilton City Council	6.19	Rezoning	Extent of Residential Zoning	Oppose	<p>The Preliminary Development Concept Master Plan shows a pocket of residential zoning adjoining Wairere Drive immediately to the south of the stormwater treatment device fronting Wairere Drive. That pocket of residential development is also traversed by overhead electricity transmission lines. Given its dimension, setting and constraints that part of the site is not well suited to creating a well-functioning residential environment.</p>	<ol style="list-style-type: none"> 1. Amend the Preliminary Development Concept Master Plan to remove residential development in the area of the site immediately south of the stormwater treatment fronting Wairere Drive. 2. Alternatively include objectives, policies, rules, and assessment criteria that address the reverse sensitivity effects that will arise from the provision of such residential development in close proximity to Wairere Drive and the existing overhead electricity transmission lines.
6	Hamilton City Council	6.20	Provisions	Rule 6.3(jj) Drive Through Service in Business 6 Zone	Oppose	<p>Rule 6.3(jj) provides for Drive Through Services in the Business 6 Zone in the Ruakura Tuumata Structure Plan Area as a Restricted Discretionary Activity. Drive Through Services are a Non-Complying Activity in the Business 6 Zone elsewhere in Hamilton.</p> <p>From a review of the Integrated Transport Assessment provided with the Private Plan Change it does not appear that the traffic effects of the drive-through service provision in the zone</p>	<p>If the Business 6 Zone Neighbourhood Centre zoning is retained: Delete the provision for a drive-through service in the Business 6 Neighbourhood Centre provisions as a Restricted Discretionary Activity in Rule 6.3(jj) and replace it with Non-Complying Activity status, unless sufficient evidence can be provided that the potential traffic effects of a drive-through service have been assessed and are acceptable.</p>

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						rules have been assessed, meaning that the relatively permissive Restricted Discretionary Activity status has not been justified.	
6	Hamilton City Council	6.21	Provisions	Affordable housing	Support in part	<p>The plan change documentation refers to affordable housing, but there are no planning provisions which ensure affordable housing outcomes will be achieved.</p> <p>There is precedent within Hamilton City Council for new plan change areas, particularly where industrial uses are being transferred to residential that affordable housing provisions are included.</p>	<p>Include affordable housing objectives, policies and rules modelled off Te Awa Lakes and Rotokauri North. For example, Rotokauri North provisions are as follows:</p> <p><u>Objective: To promote availability of affordable housing to First Home Buyers.</u></p> <p><u>Policy: For new developments containing 15 or more individual residential housing units or involving the creation of 15 or more fee simple titled sections, 10 percent of the new individual residential housing units should be affordable for First Home Buyers, with the purchase price to be set relative to the average QV house price in Hamilton at the time of sale to the First Home Buyer.</u></p>
6	Hamilton City Council	6.22	Infrastructure	Infrastructure delivery responsibility	Support in part	HCC is supportive of the public infrastructure identified in the Preliminary Development Concept Master Plan. However, it seeks plan provisions that ensure that the responsibility for the delivery of that infrastructure, at specifications approved by HCC, rests with the developer, not HCC.	That any necessary amendments are made to the Private Plan Change 15 to ensure that the responsibility for the delivery of the infrastructure, at specifications approved by HCC, as identified in the Preliminary Development Concept Master Plan, and PC15 more generally, rests with the developer, not HCC.
7	Kāinga Ora Homes and Communities	7.1	Integration with Plan Change 12	Spatial application General Residential Zone within the Precinct	Support in part	Kāinga Ora support the application of the General Residential Zone within the Tuumata Residential Precinct: however, the provisions should be streamlined to reflect both what has been proposed through Hamilton's PC12 and the Kāinga Ora submission on PC12.	<ol style="list-style-type: none"> 1. Kāinga Ora seek the General Residential Zone provisions proposed through PC12, subject to relief sought through the Kāinga Ora submission on PC12, be applied across the Precinct. 2. Kāinga Ora accept that due to the location of the Precinct, there will be specific provisions

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							that relate only to the Precinct that should be included in the District Plan above what is proposed for the General Residential Zone through PC12.
7	Kāinga Ora Homes and Communities	7.2	Provisions	Objectives and Policies 3.7.3.12 and 3.7.3.13e	Support	Kāinga Ora support the inclusion of objectives and policies that clearly highlight the need for development within the structure plan area, to give effect to the outcomes of Te Ture Whaimana o Te Awa o Waikato.	Retain as notified.
7	Kāinga Ora Homes and Communities	7.3	Provisions	Policy 3.7.3.13f	Support	Kāinga Ora support the inclusion of the policy to prioritise active and public transport connections over the private motor vehicle.	Retain as notified.
7	Kāinga Ora Homes and Communities	7.4	Provisions	Potable water supply Rules 3.7.4.4.1	Oppose in part	Kāinga Ora oppose the reliance of the structure plan on the existing potable water supply connection and the ability for this existing network to serve up to 1,250 residential lots. For consistency, the provisions of 25.13 of the District Plan should apply to the Tuumata Structure Plan area.	Amend 3.7.4.4.1 as follows: i. Prior to the operation of the Ruakura reservoir, <u>subject to the provisions of chapter 25.13</u> , up to 1250 residential lots in the Ruakura Structure Plan may be serviced from the existing Pardoa Boulevard / Wairere Drive water connection. Once the Ruakura water reservoir is operational, all existing and proposed residential development within the structure plan area shall be connected to the reservoir via a new distribution network.
7	Kāinga Ora Homes and Communities	7.5	Provisions	Wastewater network Rules 3.7.4.4.2	Oppose in part	Whilst Kāinga Ora support the retention and alteration of the existing rule framework relating to wastewater; provision should also be made for reference to 25.13 with regards to City Wide infrastructure provisions that should apply to the Tuumata Structure Plan area.	Amend 3.7.4.4.2 as follows: a. The wastewater network shall extend along the Spine Road corridor to the full extent of the Land Development Plan Area boundary and adjacent also to the Ruakura – Tuumata Structure Plan area, in accordance with Figure 2-15B Ruakura Strategic Infrastructure (Appendix 2).

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							<p>b. The wastewater network shall discharge into the Ruakura Strategic Infrastructure wastewater network.</p> <p><u>Note: Chapter 25.13 shall apply to development within the Tuumata Residential Precinct.</u></p>
7	Kāinga Ora Homes and Communities	7.6	Provisions	Stormwater network Rules 3.7.4.4.4	Oppose in part	Whilst Kāinga Ora support the management of stormwater effects arising from development, it is considered that both the existing provisions and those of PC12 within chapter 25.13 are sufficient to address this aspect of the development. Moreover, relying on the provisions of chapter 25.13 ensures that the provisions associated with development within the structure plan, are consistent with those amendments sought through PC12 particularly in how these seek to give effect to Te Ture Whaimana.	Delete rule 3.7.4.4.4 and rely upon chapter 25.13 to regulate effects of stormwater.
7	Kāinga Ora Homes and Communities	7.7	Provisions	General Residential Zone 4.1.1.1 Whole chapter References within 4.2	Oppose in part	The specific provisions proposed to relate specifically to the Tuumata Residential Precinct are the same as those proposed to relate to the provisions proposed through private plan change 13 (Te Rapa Racecourse).	Amend references to ensure all current plan changes will seamlessly integrate into an Operative District Plan.
7	Kāinga Ora Homes and Communities	7.8	Provisions	General Residential Zone Objective 4.2.15	Oppose in part	This objective is a duplicate of objective 4.2.2.2 of PC12. In light of this objective, which is partly objective 1 of the NPS-UD, being a requirement of the HSAA, it is not considered necessary to duplicate this.	Delete objective as this will be addressed through PC12.
7	Kāinga Ora Homes and Communities	7.9	Provisions	General Residential Zone	Oppose in part	These policies are duplicates of 4.1.2.3a-4.1.2.3d proposed through PC12. It is not considered necessary to duplicate these.	Delete policies as these will be addressed through PC12.

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				Policies 4.2.15a-4.2.15d			
7	Kāinga Ora Homes and Communities	7.10	Provisions	General Residential Zone Objective 4.2.16 and Policy 4.2.16a	Oppose in part	Kāinga Ora supports the general direction of this objective; however, the intent of this objective and policy 4.2.16a has been addressed through objective 4.3.2.2 and policy 4.3.2.2a and 4.3.2.2c of PC12. It is not considered necessary to duplicate these.	Delete objective and identified policy as these will be included through PC12.
7	Kāinga Ora Homes and Communities	7.11	Provisions	General Residential Zone Objective 4.2.17	Support in part	Kāinga Ora supports the general direction of this objective; however, reference to the provision of amenity in accordance with the planned built environment should be included.	Amend objective 4.2.17 as follows: Residential units within the Tuumata Residential Precinct are designed and developed to create an attractive and safe urban environment, providing an appropriate level of amenity <u>that is consistent with the planned built environment</u> :
7	Kāinga Ora Homes and Communities	7.12	Provisions	General Residential Zone Policy 4.2.17b	Oppose	Whilst Kāinga Ora support the overall intent of this policy to deliver positive design outcomes for more comprehensive scaled developments, the policy has been written in a prescriptive manner that resembles design guidance and is an expansion of policy 4.2.17a. The more broad approach of 4.2.17a is sufficient to direct developments towards positive design outcomes.	Delete policy 4.2.17b
7	Kāinga Ora Homes and Communities	7.13	Provisions	General Residential Zone Rules 4.3.3a-i	Oppose in part	Kāinga Ora support the application of the General Residential Zone as proposed through PC12, subject to the relief sought by the Kāinga Ora submission under PC12, within the Precinct. However, consider this unnecessary duplication once PC12 is made operative.	Subject to the relief sought by Kāinga Ora PC12 submission, rules 4.3.3a-i be removed to avoid unnecessary duplication with those provisions approved under PC12 once PC15 is incorporated within the District Plan.

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7	Kāinga Ora Homes and Communities	7.14	Provisions	General Residential Zone Performance standards 4.15.1 - Density	Support in part	<p>There is a note included within this section that refers to the infrastructure Capacity Overlay imposed through chapter 25.13 (introduced through PC12).</p> <p>Consistent with the Kāinga Ora submission under PC12, reference to the Infrastructure Capacity Overlay is opposed.</p> <p>The notified Infrastructure Capacity Overlay does not include the Ruakura Structure Plan, and therefore the density controls proposed through PC12 will have no bearing on future residential development within the Tuumata Precinct and the reference is irrelevant.</p>	<p>Delete note</p> <p>Refer to Chapter 25.13 Three Waters Infrastructure Capacity Overlay relating to density requirements.</p> <p>For clarity, consistent with the relief sought under submission point no. 5-7, general reference should be made to the provisions of chapter 25.13, within Chapter 3 of the District Plan. Residential development outside of the overlay proposed through PC12 is subject to an Infrastructure capacity assessment where a development proposed 4+ residential units.</p>
7	Kāinga Ora Homes and Communities	7.15	Provisions	General Residential Zone Performance standards 4.15.2 – Building Coverage	Support in part	Standard 4.15.2 is a duplicate of 4.2.5.2 of PC12.	The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions.
7	Kāinga Ora Homes and Communities	7.16	Provisions	General Residential Zone Performance standards 4.15.3 – Permeability and Landscaping	Oppose in part	<ol style="list-style-type: none"> Standard 4.15.3 is a duplicate of 4.2.5.3 of PC12. Consistent with the relief sought on standard 4.2.5.3d of PC12, Kāinga Ora oppose the requirements for urban trees and minimum planting sizes across residential zones. The standard is not an efficient or effective method in achieving the objectives of the zone, as there will be ongoing compliance costs associated with ensuring that trees are retained post-development. The standard may also be difficult to enforce and monitor for permitted activity development where a resource consent is not required. 	<ol style="list-style-type: none"> The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions. Consistent with the Kāinga Ora relief sought under PC12, delete the urban trees standard and associated 'notes' as notified, and any other changes necessary to give effect to the relief sought.

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7	Kāinga Ora Homes and Communities	7.17	Provisions	General Residential Zone Performance standards 4.15.4 – Building Height	Support in part	Standard 4.15.4 is a duplicate of 4.2.5.4 of PC12.	The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions.
7	Kāinga Ora Homes and Communities	7.18	Provisions	General Residential Zone Performance standards 4.15.5 – Height in relation to boundary	Support in part	Standard 4.15.5 is a duplicate of 4.2.5.5 of PC12.	The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions.
7	Kāinga Ora Homes and Communities	7.19	Provisions	General Residential Zone Performance standards 4.15.6 – Building Setbacks	Support in part	Standard 4.15.6 is a duplicate of 4.2.5.6 of PC12.	The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions.
7	Kāinga Ora Homes and Communities	7.20	Provisions	General Residential Zone Performance standards 4.15.7 – Boundary Fences and Walls	Oppose in part	Standard 4.15.7 is a duplicate of 4.2.5.7 of PC12. Consistent with the relief sought through PC12, Kāinga Ora does not support retaining walls above 3.5m as a discretionary activity being listed in the standard. This should be accounted for in the zone activity table as a non-compliance with a general standard.	The provisions should be deleted, with the General Residential provisions of PC12, subject to the relief sought by Kāinga Ora, being relied upon for the Precinct provisions.
7	Kāinga Ora Homes and Communities	7.21	Provisions	General Residential Zone Performance standards 4.15.8 – Public Interface	Oppose in part	<ol style="list-style-type: none"> Standard 4.15.8a is a duplicate of 4.2.5.8 of PC12. Consistent with the relief sought through PC12, Kāinga Ora generally understands that development of certain typologies may need to manage effects in relation to outlook and the broader design-related issues regarding 	The provisions should be deleted, with the General Residential provisions of PC12, subject to the relief sought by Kāinga Ora, being relied upon for the Precinct provisions.

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						<p>interface and engagement with the public streetscape; however, consider the public interface standard of the MDRS, as imposed through 4.2.5.8 is sufficient.</p> <p>3. Consistent with the relief sought through PC12, Kāinga Ora opposes c – e as they are overly prescriptive as general development standards. There are a range of site contextual factors that would determine whether such requirements are appropriate. These are general design principles that are better accommodated within non-statutory design guidelines (which sit outside of the District Plan) or assessment criteria.</p>	
7	Kāinga Ora Homes and Communities	7.22	Provisions	General Residential Zone Performance standards 4.15.9 – Outlook Space	Support in part	Standard 4.15.9 is a duplicate of 4.2.5.9 of PC12.	The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions.
7	Kāinga Ora Homes and Communities	7.23	Provisions	General Residential Zone Performance standards 4.15.10 – Outdoor Living Areas	Support in part	Standard 4.15.10 is a duplicate of 4.2.5.10 of PC12.	The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions.
7	Kāinga Ora Homes and Communities	7.24	Provisions	General Residential Zone Performance standards 4.15.11 – Waste	Oppose	Consistent with the relief sought through PC12, Kāinga Ora consider this to be assessment criteria rather than a standard, to provide for flexibility in design.	Delete the standard in its entirety.

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				Management and Service Areas			
7	Kāinga Ora Homes and Communities	7.25	Provisions	General Residential Zone Performance standards 4.15.12 – Storage Areas	Oppose	<ol style="list-style-type: none"> Standard 4.15.12 is a duplicate of 4.2.5.12 of PC12. Consistent with the relief sought through PC12, Kāinga Ora consider this to be assessment criteria rather than a standard, to provide for flexibility in design. 	Delete the standard in its entirety, consistent with the relief sought by Kāinga Ora through PC12.
7	Kāinga Ora Homes and Communities	7.26	Provisions	General Residential Zone Performance standards 4.15.13 – Accessory buildings, Vehicle access and Vehicle parking	Oppose in part	<ol style="list-style-type: none"> Standard 4.15.13 is a duplicate of 4.2.5.13 of PC12. Consistent with the relief sought through PC12, Kāinga Ora generally supports the need to manage the number of vehicle crossings and garages to public streets. Kāinga Ora does not however, support the requirement for a consent notice (which can only be imposed under a subdivision consent) under a s9 land use rule. The reference to a consent notice should therefore be deleted. Kāinga Ora does not support the inclusion of planting requirements associated with vehicle parking spaces on-site. This is overly onerous and the landscaping requirements for a site, as imposed through the MDRS, are sufficient. 	<ol style="list-style-type: none"> The provisions should be deleted, with the General Residential provisions of PC12, subject to the relief sought by Kāinga Ora, being relied upon for the Precinct provisions. Include the standard as-notified, subject to deletion of the ‘consent notice’ reference. Delete standard 4.15.13.f, consistent with the relief sought by Kāinga Ora through PC12.
7	Kāinga Ora Homes and Communities	7.27	Provisions	Design guidelines	Oppose in part	<p>Consistent with relief sought through PC12, Kāinga Ora opposes the inclusion of Design Guides or design guidelines in the Plan, which act as de facto rules to be complied with.</p> <p><i>General Residential Zone 4.11 RD – Matters of Discretion – xxii. 4 or more residential units on site C – character and Amenity</i></p>	Delete reference to the Residential Design Guide.

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						<i>N17 – Tuumata Design and layout</i> <i>For clarity, 1.4.2 Residential Design Guide (Residential and Special Character Zones) applies.</i>	
7	Kāinga Ora Homes and Communities	7.28	Provisions	Chapter Subdivision Rules Table 23.e	Oppose in part	The specific provisions proposed to relate specifically to subdivision within the Tuumata Residential Precinct are the same as those proposed to relate to the provisions proposed through private plan change 13 (Te Rapa Racecourse).	Amend references to ensure all current plan changes will seamlessly integrate into an Operative District Plan.
7	Kāinga Ora Homes and Communities	7.29	Provisions	Chapter Subdivision Rules Table 23.e	Oppose in part	The proposed rule framework for subdivision for the General Residential Zone through PC12 should be applied to the Precinct to avoid overly complicated zone provisions.	Replace proposed subdivision provisions with those proposed for the General Residential Zone of PC12, and then removed once PC12 is made operative to avoid to avoid unnecessary duplication and complication of provisions.
7	Kāinga Ora Homes and Communities	7.30	Provisions	Chapter Subdivision Rules 23.e.vi	Oppose	<ol style="list-style-type: none"> The proposed activity status of Restricted Discretionary is overly restrictive considering that unit tile subdivision is around buildings and does not create vacant allotments. In the absence of relief sought through submission point 7.30, consistent with the provisions proposed through PC12, this activity status should be amended to be a Controlled Activity. 	<ol style="list-style-type: none"> Consistent with relief sought under submission point no. 7.30, replace proposed subdivision provisions with those proposed for the General Residential Zone of PC12, and then removed once PC12 is made operative to avoid unnecessary duplication and complication of provisions. In the absence of the above relief, amend rule 23.3.e.vi as follows: vi. Unit title Subdivision* RD* C
7	Kāinga Ora Homes and Communities	7.31	Provisions	Chapter Subdivision Rules 23.e.viii	Oppose	<ol style="list-style-type: none"> The proposed rule framework for subdivision for the Medium Density Zone through PC12 should be applied to the Precinct to avoid overly complicated zone provisions. Rules a-g unnecessarily complicates the provisions. Kāinga Ora consider that a single Restricted Discretionary rule for fee simple subdivisions that create vacant allotments is 	<ol style="list-style-type: none"> Replace the proposed subdivision provisions with the Medium Density provisions of PC12 and then be deleted once PC12 is incorporated into the District Plan. Subject to the relief sought by the Kāinga Ora PC12 submission. In the absence of the above relief, amend rule 23.3e.viii as follows:

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						sufficient to enable the appropriate assessment of standards imposed through 23.7.9, subject to the relief sought further in this submission.	<p>viii. Fee simple subdivision*: RD*</p> <p>a. Any subdivision not in general accordance with the Ruakura Tuumata Structure Plan Area (Figures 2-14A and 2-14B). Fee simple subdivision within the Tuumata Residential Precinct that complies with Rule 23.7.2.</p> <p><u>C</u></p> <p>b. Any fee simple subdivision which creates a rear lot in the Tuumata Residential Precinct. Fee simple subdivision that creates vacant lots within the Tuumata Residential Precinct.</p> <p><u>D RD</u></p> <p>c. Creation of any vacant lots not meeting the minimum lot size specified in Rule 23.7.1 below D</p> <p>d. Creation of any vacant lots not meeting the minimum lot dimensions specified in Rule 23.7.9 below D</p> <p>e. Any subdivision not meeting the block layout dimensions or minimum specified in Rule 23.7.9 below D</p> <p>f. Any subdivision with access not meeting Rule 23.7.9 below D</p> <p>g. Any subdivision to create road to vest that does not meet the minimum widths in 23.7.9 D</p>
7	Kāinga Ora Homes and Communities	7.32	Provisions	Chapter Subdivision Standards 23.7.1aa	Oppose	Kāinga Ora opposes the inclusion of a minimum net site areas, and requests that a minimum shape factor be relied upon instead for subdivision within the Tuumata Residential Precinct. This would sufficiently ensure that smaller vacant lot sizes are not created which might otherwise foreclose multiunit redevelopment of a single site,	<p>Replace reference to a minimum net site area with a shape factor. Consistent with the Kāinga Ora submission on PC12, the following is recommended:</p> <p>Vacant lot subdivision: <u>Accommodate a rectangle of 8m x 15m</u></p>

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						in accordance with the MDRS and the enabling provisions of the zone.	
7	Kāinga Ora Homes and Communities	7.33	Provisions	Chapter 1.1 Definitions and Terms	Oppose	Tuumata residential terrace dwelling and Tuumata residential apartment dwelling The proposed definitions are duplicates of the definitions proposed for 'terrace housing' and 'apartment building' through PC12. It is not necessary to duplicate the definition to accommodate typologies within the Tuumata Precinct.	Delete definitions.
7	Kāinga Ora Homes and Communities	7.34	Provisions	Chapter 1.3 Assessment Criteria N15h	Oppose	Kāinga Ora oppose the inclusion of assessment criteria that reference the avoidance of the creation of rear lots. The avoidance of rear lots may result in under-development of the residential precinct rather than encouraging comprehensive residential development in accordance with the MDRS.	Delete assessment criteria N15h.
7	Kāinga Ora Homes and Communities	7.35	Provisions	Chapter 1.3 Assessment Criteria N17	Oppose in part	Whilst Kāinga Ora generally supports the proposed amendments to Appendix 1.3 and the additional assessment criteria, the inclusion of assessment criteria that is comparable to a design guide is opposed. Assessment criteria of N17 should be retained only so far as high level urban design principles, such as that detailed through the explanatory text.	Delete assessment criteria N17a-i and amend assessment criteria as follows: N17 Tuumata Design and Layout Explanation: Assessment criteria are a tool to help ensure good quality outcomes are achieved. They describe key urban design elements that should be examined through the design process. In terms of design and layout, the elements are: ...

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8	Transpower New Zealand Limited	8.1	National Grid	Rule 3.7.4.3.6 (iii)	Oppose	<p>Transpower do not support Rule 3.7.4.3.6 (iii), as notified. The plan change request indicates that <i>“the focus of the rule is on buildings, with land use, subdivision and earthworks being effectively controlled already by the above referenced rules in the District Plan”</i>. There are already rules in 25.7.4 that regulate buildings in the National Grid Yard, with provisions for buildings in greenfield areas being more stringent.</p> <p>This rule creates confusion with Rule 25.7.4.</p>	For Rule 3.7.4.3.6 (iii) to be deleted and any further alternative or consequential relief as may be necessary to achieve this relief.
9	Waikato Regional Council	9.1	Ecology	Black mudfish 3.6 Freshwater	Neutral	<p>The EIA states that the latest freshwater fauna surveys were undertaken in March 2022 when drains were largely dry. Ideally this monitoring would be undertaken during late autumn, winter, or early spring. We therefore query whether more sampling is planned.</p> <p>We note that WRC has recorded mudfish in previous sampling undertaken near the plan change site.</p> <p>Any mudfish found in the drains within the site will need to be removed and translocated prior to development, with records of fish found provided to WRC.</p>	Confirm whether further sampling for black mudfish is planned for the plan change site.
9	Waikato Regional Council	9.2	Ecology	Black mudfish 6.5 Proposed freshwater management	Neutral	<p>The EIA identifies that the Powell’s Road drain is considered a ‘significant habitat of indigenous fauna’ for black mudfish in accordance with the WRPS criteria. The EIA states that existing black mudfish habitat in current farm drains will be replaced with a purpose-designed wetland basin (BE1) east of the Ruakura Structure Plan Area.</p>	Provide further detail in relation to the BE1 wetland proposed as compensation for the loss of black mudfish habitat.

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						<p>We request more detail in relation to this proposed wetland, including:</p> <ul style="list-style-type: none"> • The proposed location, size, and shape of the wetland. • The proposed depth profile of the wetland. • Shading, planting, soils, and drainage information. • How the wetland is planned to be stocked. • How the wetland is proposed to be protected from invasive fish and how flooding, drought, temperature, and nuisance weeds are proposed to be managed. <p>We also request more detail on the proposed wetland monitoring after development and stocking, as well as plans if the wetland fails to maintain a sustainable mudfish population.</p>	
9	Waikato Regional Council	9.3	Ecology	Long-tailed bats 4.2.1 Acoustic bat survey	Oppose in part	<p>We have concerns about the number and locations of automatic bat monitors (ABMs) deployed in the bioacoustic survey. The location of ABMs deployed was biased toward selective large trees. Bats also use open fields for foraging and commuting; however, ABMs were not deployed in any open areas on the site.</p> <p>As only one survey has been undertaken to inform the proposed plan change, there is limited information available to understand the extent to which bats are using the site at present.</p>	That further assessment be undertaken to provide a better understanding of the current use of the site by long-tailed bats and effects of the plan change on bats and bat habitat.
9	Waikato Regional Council	9.4	Ecology	Long-tailed bats 4.2.2 Bat roost survey	Oppose in part	<p>We have some concerns about the bat roost assessment undertaken, specifically:</p> <ul style="list-style-type: none"> • The EIA does not state who undertook the bat roost survey and whether they are suitably 	<ol style="list-style-type: none"> 1. Clarify who undertook the bat roost survey discussed in the EIA. 2. Provide more information on the specific trees identified as being low, medium, and high risk for bat roosting across the site. Any

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						<p>qualified/experienced to carry out this survey.</p> <ul style="list-style-type: none"> We note that the potential roost trees identified were predominantly very large trees. The EIA identifies Robinia pseudoacacia on the subject site, which is commonly used by bats for roosting. We are not able to understand from the EIA where the Robinia pseudoacacia are located on the site and therefore whether these trees were identified as potential roost trees or not. We also note that, as acknowledged in the EIA, the roost tree assessment is limited in that it only relates to bat roost features visible from the ground. Therefore, no assumption should be made that other roost features are not present. The EIA states that <i>“the low and medium risks vegetation did contain bat roosting features. However, these features were generally limited to occasional broken branches or cavities.”</i> We consider that vegetation containing bat roosting features should not be classified as ‘low risk’. 	<p>trees which contain bat roosting features should be classified higher than ‘low risk’.</p>
9	Waikato Regional Council	9.5	Ecology	Long-tailed bats 5.2 Bats	Oppose in part	<p>We consider there is not sufficient information to properly understand the current use of the site by long-tailed bats, including whether bats are using vegetation on the site for roosting. It is possible bats may be using the site for maternity roosts, not just solitary roosts.</p> <p>Additionally, we note that there is a reasonable number of trees on the AgResearch campus</p>	<p>To give effect to WRPS Policies ECO-P1 and ECO-P2, we recommend that further assessment is required to inform the plan change to ensure that bat habitat will be sufficiently protected.</p>

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						<p>immediately to the south of the site; bats may be utilising the connectivity between the two sites at present. Ultimately, we consider there is insufficient information on the value of the habitat for long-tailed bats to make the assessment that the magnitude of effect due to loss of bat habitat will be moderate.</p> <p>Based on the information available, it is difficult to assess the effects of the proposed plan change on long-tailed bats, however, we consider it appropriate to adopt a precautionary approach given the Threatened - Nationally Critical status of long-tailed bats.</p>	
9	Waikato Regional Council	9.6	Ecology	Long-tailed bats 6.2 Proposed bat management	Oppose in part	<p>The Plan Change Request states that <i>“The Boffa Miskell report does not identify any significant habitat for terrestrial species in the Plan Change area, following survey work”</i>. While Appendix 13 - Policy Assessments provides an assessment against objectives and policies of the Ecosystems and Indigenous Biodiversity (ECO) chapter of the WRPS in relation to mudfish, it does not provide an assessment against this chapter in relation to long-tailed bats.</p> <p>We highlight that WRPS Appendix APP5 – Criteria 3 includes vegetation or habitat that is currently habitat for indigenous species that are classed as threatened or at risk. The EIA identifies that long-tailed bats (a Threatened – Nationally Critical species) have been recorded within the plan change site and that the site contains potential bat roost trees.</p>	Amend provisions to prioritise protection of any known or potential bat roost trees within the plan change area and maintain connectivity to the wider landscape.

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						<p>The WRPS directs district plans to require activities to avoid loss of significant habitat of indigenous fauna in preference to remediation or mitigation (ECOM13).</p> <p>The EIA does not make recommendations to avoid, remedy or mitigate the proposed loss of bat habitat on the site, and instead recommends compensation in the form of artificial bat roost boxes to be installed in or near the Mangaonua Gully to the south of the site. This approach does not follow the effects management hierarchy set out in the WRPS.</p> <p>When bat roost trees are felled or removed, bats may not be able to easily move to another equally suitable roost because they may be already occupied by other bats, or they may not be available because of their rarity. Each known roost in the Hamilton area is therefore likely to be of high value to the local bat population.</p> <p>Artificial roost boxes are not a substitute for natural habitat and are not guaranteed to be effective.</p> <p>We therefore consider the plan change provisions should prioritise the protection of potential bat roost trees on the site, as well as maintenance of connectivity to the wider landscape.</p>	
9	Waikato Regional Council	9.7	Ecology	Long-tailed bats 6.2 Proposed bat management	Oppose in part	<p>The EIA recommends that a Bat Management Plan (BMP) be developed to outline how the EIA recommendations will be implemented to ensure that the potential effects of the proposed development on long-tailed bats are appropriately managed. The EIA also</p>	<p>Add new rules relating to the preparation of a Bat Management Plan for the plan change area – see submission point 9.20 below.</p>

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						<p>recommends that <i>“This management plan should also show integration with other mitigation actions and management plans developed for other Land Development Plan Areas and seek to integrate the management approach”</i>.</p> <p>The Plan Change Request does not comment further on this recommendation and no rule is proposed within the plan change provisions requiring the development of a BMP.</p> <p>To implement this recommendation, we recommend that the plan change should include a rule requiring the development of a BMP for the plan change site as part of the first resource consent application for the Ruakura – Tuumata Structure Plan Area. See submission point 9.20 below in relation to this.</p>	
9	Waikato Regional Council	9.8	Sub-catchment ICMP and Appendices		Support in part	<p>The proposed stormwater management regime for the site generally aligns with the Waikato Stormwater Management Guideline 2020. We do however seek one point of additional assessment in relation to potential drainage overflow, as detailed in submission point 9.9.</p>	None requested - see submission point 9.9.
9	Waikato Regional Council	9.9	Sub-catchment ICMP and Appendices		Oppose in part	<p>WRC’s drainage scheme is located to the east of the plan change site, across the Waikato Expressway. It appears that as part of the proposed development there may be some overland flow, in a greater than 10-year event, that may flow east toward the drainage scheme.</p> <p>If there is a potential overflow to the east of the plan change site, an assessment of effects should be provided in relation to this, even if it is just to</p>	Provide an assessment of effects in relation to any potential for drainage overflow to the east of the plan change site.

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						<p>show that the peak overflow does not impact land drainage level of service targets.</p> <p>While the plan change documentation includes plans and models outputs for stormwater, the only reference to rainfall is that 24-hour rainfalls from High Intensity Rainfall System (HIRDS) were used. There does not appear to be any comment on the temporal distribution of that rainfall over the 24 hours. The concern is that the critical duration of the storm event is dependent on rainfall intensity for catchment time of concentration. It is unlikely that the critical duration in the plan change area is 24 hours; rather it is likely to be significantly less.</p> <p>Council needs to be confident that any overflow is compatible with the critical duration event for land drainage drains. Land drainage design includes ponding attenuation as it allows for three days' drainage time. Therefore, the actual flow in the drain may be relatively low even in the 10-year event.</p> <p>The plan change application needs to show that with the proposed changes, the overflow discharge is no greater than the drainage design flow. This would mean that any for the 10-year event the overflow peak equates to an average flow draining 38mm over 24 hours.</p>	
9	Waikato Regional Council	9.10	Rezoning	Structure Plan Walking and cycling connections	Support	We support the provision of walking and cycling connections and the connections into the existing cycleway network. Additionally, the walking and cycling provisions integrate well with the proposed bus stops.	Retain.

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9	Waikato Regional Council	9.11	Rezoning	Neighbourhood Centre	Support in part	We support the proposed location of the Neighbourhood Centre in that it is well within the walkable catchment for the Tuumata development, as well as the wider Fairview Downs area (should there be appropriate walking connections as described in submission point 9.21 below).	Retain.
9	Waikato Regional Council	9.12	Rezoning	Higher residential density	Oppose in part	<p>The residential portion of the plan change site is proposed to be zoned General Residential (with the Tuumata Residential Precinct overlay) in its entirety. Ideally, we consider there should be higher density development around public transport nodes on frequent corridors (the Fifth Avenue extension and Eastern Transport Corridor), with lowest densities the furthest away from public transport nodes.</p> <p>While the proposed rules enable up to three dwellings per site as a Permitted Activity, allowing single dwellings as a Permitted Activity means there is potential that sites could be predominantly developed to a relatively low density without the need for resource consent, including around those public transport nodes.</p> <p>We suggest that a higher density zoning or overlay should be applied around public transport nodes on frequent corridors, which does not provide for single dwellings as a Permitted Activity. This would align with the Hamilton- Waikato Metropolitan Spatial Plan and Hamilton Urban Growth Strategy, which support growth along transport corridors.</p>	<p>Apply a higher density zoning or overlay around public transport nodes on frequent corridors, which does not provide for single dwellings as a Permitted Activity.</p> <p>Add new objectives, policies, rules, and assessment criteria to the plan change provisions to support this.</p>

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9	Waikato Regional Council	9.13	Provisions	Structure Plans Ruakura 3.7a.iv Vision	Support	We support the overall vision proposed for the Ruakura – Tuumata Structure Plan Area within PC15, of a residential neighbourhood with a comprehensive network of green open space, a multi-functional transport network and the provision for day-to-day community and retail needs of the locality, contributing to the creation of a well-functioning urban environment.	Retain.
9	Waikato Regional Council	9.14	Provisions	Structure Plans Ruakura 3.7h. Explanation to Rules	Support in part	Section 3.7h.iii. includes a copy of Table 35 from the Operative WRPS, which sets out industrial land allocations for the Future Proof area. The proposed amendment to 3.7h.iii.b. within PC15 refers to industrial land allocation within the Future Proof Strategy 2022, however this amendment does not align with the table, which has not been updated to align with the most recent Future Proof Strategy. Table 35 is proposed to be amended by WRPS Change 1 to reflect the Future Proof Strategy 2022. Therefore, depending on the timing of decisions on WRPS Change 1, there may be an opportunity to update the table within PC15 to reflect this.	Depending on the timing of decisions on Proposed WRPS Change 1, either update the table under 3.7h.iii. to reflect Table 35 within WRPS Change 1 or amend the description in 3.7h.iii.b. to clarify that the industrial land allocations described are those in the Future Proof Strategy 2022, not the table above.
9	Waikato Regional Council	9.15	Provisions	Structure Plans Ruakura 3.7.1.6c. Residential Zones	Support	We support the proposed overall net density of 50 dwellings per hectare for the Tuumata Residential Precinct. This aligns with density targets within the Future Proof Strategy and Proposed WRPS Change 1.	Retain.
9	Waikato Regional Council	9.16	Provisions	Structure Plans Ruakura Objective 3.7.3.12	Support	We support the proposed outcomes for development of the Ruakura –Tuumata Structure Plan Area, including an integrated, multi-modal and safe transport network that provides travel	Retain.

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						choices, and giving effect to Te Ture Whaimana o Te Awa o Waikato – The Vision and Strategy for the Waikato River.	
9	Waikato Regional Council	9.17	Provisions	Structure Plans Ruakura Policy 3.7.3.13e	Support	We support the policy that developments and activities in the Structure Plan Area must give effect to the outcomes of Te Ture Whaimana, and the methods specified to achieve this.	Retain.
9	Waikato Regional Council	9.18	Provisions	Structure Plans Ruakura 3.7.4.3.9a. Explanation to Rules	Support in part	Section 3.7.4.3.9a. refers to Table 6-2 of the WRPS. With the conversion of the WRPS to the National Planning Standards format, this table is now identified as Table 35. WRPS Change 1 proposes amendments to Table 35 to reflect the Future Proof Strategy 2022. Depending on the timing of decisions on WRPS Change 1, there may be an opportunity to amend this explanation to refer to any updated industrial land allocations as a result of WRPS Change 1.	Replace the reference to 'Table 6-2' in 3.7.4.3.9a. with 'Table 35'. Depending on the timing of decisions on Proposed WRPS Change 1, amend 3.7.4.3.9a to reflect updated industrial land allocation figures and timing within WRPS Change 1.
9	Waikato Regional Council	9.19	Provisions	Structure Plans Ruakura Rule 3.7.4.4.5	Support	We support the inclusion of provisions relating to the use of water conservation measures. This aligns with WRPS Method LF-M20.	Retain.
9	Waikato Regional Council	9.20	Provisions	Structure Plans Ruakura New rules relating to Bat Management Plan	New	To implement the recommendations of the EIA, we recommend that the plan change should include a rule requiring the development of a BMP for the plan change site as part of the first resource consent application for the Ruakura – Tuumata Structure Plan Area. The BMP should be prepared by a suitably experienced bat ecologist and cover matters including, but not limited to:	<ol style="list-style-type: none"> 1. Add new rule requiring the preparation of a Bat Management Plan for the Ruakura – Tuumata Structure Plan Area as part of the first resource consent application for this area. 2. Add new rule(s) within the Structure Plan, Residential Zone and/or Subdivision chapters requiring all subsequent subdivision and/or land use consent applications to be consistent with the approved BMP, or any

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						<ul style="list-style-type: none"> • Identification of all confirmed or potential bat roost trees within the Structure Plan area. • Analysis of the practicability of retaining each potential roost tree. • Best practice tree removal protocols and mitigation for any potential roost trees that have been identified as needing to be removed, and methods to mitigate associated ecological effects. Where any ecological effects are unable to be mitigated, the BMP shall set out methods to ensure that any more than minor residual ecological effects are offset to achieve a no net loss outcome. • Opportunities for protection and enhancement of bat habitat within the plan change area, including the extent to which development can provide for trees identified as actual or potential roost trees to be protected in perpetuity. • Consideration of how BMP initiatives link to bat habitat features in the wider landscape and potential opportunities for co-ordination with other habitat enhancement initiatives. • Measures to manage the effects of lighting on long-tailed bats. • Pre and post-development monitoring for long-tailed bats. <p>A rule should also be added requiring all subsequent subdivision and/or land use consent applications to be consistent with the approved BMP, or any variation thereof.</p>	<p>variation thereof approved by way of a subsequent resource consent.</p>

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9	Waikato Regional Council	9.21	Provisions	Structure Plans Ruakura Pedestrian connection	New	The lack of proposed pedestrian connectivity onto Northolt Road from the plan change area is potentially a missed opportunity for providing access to bus services for existing residents in Fairview Downs. We understand that provisions cannot be included in the District Plan that are outside the plan change area but suggest a “trigger” rule could be added requiring creation of a pedestrian connection, similar to that for the Fifth Avenue extension.	Add new rule to trigger the creation of a pedestrian connection from the plan change area onto Northolt Road.
9	Waikato Regional Council	9.22	Provisions	Tuumata Residential Precinct Objective 4.2.16 and associated policies	Support	We support the requirement to ensure development is coordinated with the provision of infrastructure. This gives effect to WRPS Policy UFD-P2.	Retain.
9	Waikato Regional Council	9.23	Provisions	Tuumata Residential Precinct Policy 4.2.17b	Support	We support clause x <i>“Ensuring vehicle crossings are minimized on road frontages where narrow dwellings are proposed and where shared paths and separated cycle ways are located”</i> . This will support safety outcomes and help to encourage walking and cycling within the plan change area.	Retain.
9	Waikato Regional Council	9.24	Provisions	Tuumata Residential Precinct Objective 4.2.18 and Policy 4.2.18a	Support	We support the requirement that development incorporates sustainable features and technologies, including water-sensitive techniques, provision of landscaping and trees and providing for electric bikes and vehicle charging stations.	Retain.

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9	Waikato Regional Council	9.25	Provisions	Tuumata Residential Precinct	Support in part	To align with the proposed General Residential Zone provisions within HCC's Plan Change 12, we consider a minimum permeable surface standard of 30% per site should be added to this rule. We support the inclusion of requirements for urban trees (Clause b), to align with HCC's Plan Change 12.	Add new clause requiring a minimum permeable surface area of 30% per site.
9	Waikato Regional Council	9.26	Provisions	Assessment Criteria N15b.	Support	We support these assessment criteria, particularly vi, vii and viii relating to safe movement of pedestrians and cyclists, and xi, xii and xiii relating to provision for habitats, lighting design that does not deter bat movement and stormwater management.	Retain.
9	Waikato Regional Council	9.27	Provisions	Assessment Criteria N15p.	Support in part	Subdivision assessment criterion N15p. relates to remedying or mitigating unavoidable adverse effects where land development will cause loss of significant habitats of indigenous fauna. The criterion specifically refers to black mudfish and long and shortfin eels. While we recognise the words "including but not limited to" are used, we consider it appropriate to add a reference to long-tailed bats within this criterion given that bats and potential bat roost trees have been identified within the plan change area.	Retain but amend to "Where land development to implement the subdivision will cause loss of significant habitats of indigenous fauna (including but not limited to, black mudfish, shortfin eels, and longfin eels <u>and longtailed bats</u>)..."
9	Waikato Regional Council	9.28	Provisions	Assessment Criteria N15q.	Support	We support this criterion relating to the extent to which subdivision and stormwater management methods give effect to Te Ture Whaimana.	Retain.

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9	Waikato Regional Council	9.29	Provisions	Assessment Criteria N15r.	Support	We support this criterion relating to the extent to which subdivision and stormwater management methods have been designed to manage the effects of climate change.	Retain.
9	Waikato Regional Council	9.30	Provisions	Assessment Criteria	Support in part	We support this criterion but suggest that a reference could also be added to the Waikato Stormwater Management Guideline 2020. https://waikatoregion.govt.nz/assets/WRC/WRC-2019/TR20-07.pdf	Retain but add reference to the Waikato Stormwater Management Guideline 2020.

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10	Ministry of Education	10.1	Education network	Consultation	Neutral	The proposed increase in residential density has the potential to put pressure on the local school network. Through this submission, the Ministry is seeking that recognition of the need for additional capacity in the educational network be included in the plan change, to enable the Ministry to service the growth facilitated by Private PC15.	The Ministry requests consultation remains ongoing throughout the course of the development to ensure Education Facilities are provided for in Private PC15 (with Tainui Group Holdings and Hamilton City Council).
10	Ministry of Education	10.2	Provisions Integration with Plan Change 12	PC12 - Chapter 4 4.1 4.1.2.2 4.1.2.2 g. (new)	Support in part	<p>Council has an obligation under the NPS-UD to ensure sufficient 'additional infrastructure' (which includes educational facilities) is provided in development, and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular).</p> <p>Educational facilities should therefore be enabled in the District Plan to service the growth enabled by Private PC 15. The Ministry therefore requests that additional infrastructure is specifically referenced in the objective and a new policy is added to specifically provide for additional infrastructure.</p> <p>It is requested that the definition of 'additional infrastructure' (as defined in the NPS UD) should subsequently be included in the definitions chapter of the Operative District Plan.</p> <p>In order that Private PC 15 is fully aligned with PC 12, which has not yet been heard in full or decisions made, the Ministry reiterates its submission to PC 12 as relief sought to Private PC 15.</p> <p>In addition, it is requested that the title for section 4.1 of PC12, Objectives and Policies: All Residential Zones, is amended to 4.1, Objectives and Policies: All Residential Zones <u>and Precincts</u>.</p>	<p>Amend the following objectives and policies (from PC12) as follows:</p> <p>4.1 Objectives and Policies: All Residential Zones <u>and Precincts</u></p> <p>Objective 4.1.2.2 Development maximises the use of land by providing a range of housing typologies that are consistent with the neighbourhood's planned urban built character while ensuring the provision of <u>additional infrastructure and infrastructure services</u> as part of any development.</p> <p>Add new policy (PC12) as follows: <u>Policy 4.1.2.2g</u> <u>Enable non-residential development and activities that:</u></p> <ol style="list-style-type: none"> i. <u>support the social and economic well-being of the community;</u> ii. <u>are in keeping with the with the scale and intensity of development anticipated within the zone;</u> iii. <u>enable educational facilities;</u> iv. <u>avoid, remedy or mitigate adverse effects on residential amenity; and</u> v. <u>will not detract from the vitality of the zone.</u>

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10	Ministry of Education	10.3	Provisions	Definitions	Neutral	The Ministry requests that consequentially, the definition of 'additional infrastructure' is included in the Plan as per the definition in the NPS-UD.	The definition of 'additional infrastructure' is added to the Plan as follows. <u>Additional infrastructure means:</u> a. <u>Public open space.</u> b. <u>Community infrastructure as defined in section 197 of the Local Government Act 2002.</u> c. <u>Land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities.</u> d. <u>Social infrastructure, such as schools and healthcare facilities.</u> e. <u>A network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001).</u> f. <u>A network operated for the purpose of transmitting or distributing electricity or gas.</u>
11	Tuhoro, Janie	11.1	Whole Plan Change		Support	All Council land is Māori land. Give the whenua back to Māori. Support Tainui. They are trying to build homes for their people.	Support Plan Change.
12	Waikato Housing Initiative	12.1	Whole Plan Change		Neutral	The WHI neither opposes nor supports the overall Proposed Plan Change 15 by Tainui Group Holdings (TGH), given the range and complexity of matters to be considered exceeds the scope of WHI's mandate.	None sought.
12	Waikato Housing Initiative	12.2	Provisions	Affordable housing 4.1.1.1 4.2 - explanation	Support in part	WHI is strongly supportive of the increased supply of affordable housing in the Waikato and as evidenced in the 2018 housing stocktake, there was a shortage already then of some 4000 homes in the Hamilton City area alone. WHI therefore submits in support of the stated intentions of providing "for a range of housing types, from single level standalone dwellings through to low	Retain provisions "for a range of housing types, from single level standalone dwellings through to low scale (three level) apartments" provided these include affordable options.

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						<p>scale (three level) apartments" provided these include affordable options.</p> <p>For clarity, WHI has adopted the UN Sustainable Development Goals definition of "affordable" as accommodation/housing costs not exceeding 30% of median household income (or alternatively a purchase price of not more than 3 times annual median household income).</p>	
12	Waikato Housing Initiative	12.3	Provisions	Affordable housing 3.7.1.6 c.	Support in part	<p>WHI agrees that: "This will help to meet future household demand growth, including in the short and medium terms, at a location very well suited for residential development"</p> <p>Further WHI supports that "a variety of housing types including standalone houses, duplex dwellings, terrace houses, apartments and papakainga" and "set of bespoke planning provisions to ensure excellent urban design and environmental outcomes" are useful aspirations in addressing housing needs locally.</p>	Support for part of provision 3.7.1.6 c.
12	Waikato Housing Initiative	12.4	Provisions	Affordable housing Section 32 – 10.2.5	Neutral	<p>WHI supports the acknowledgement that: "New method UFD-M63 Housing Affordability specifies that Future Proof partners should consider regulatory and non-regulatory methods to improve housing affordability such as increasing housing supply, greater housing choice, more diverse dwelling typologies, alternative delivery partners, and investigating inclusionary zoning."</p>	None sought.
12	Waikato Housing Initiative	12.5	Provisions	Affordable housing	Support in part	<p>Proposed Plan Change 15 only seeks to give effect to "increasing housing supply, greater housing choice, and more diverse dwelling typologies".</p> <p>Simply having more housing stock at market rate available has had no impact on increasing the amount of affordable housing stock available.</p>	That specificity be incorporated regarding affordable housing provisions and how these are to be implemented, based on examples of recent Te Awa Lakes and Rotokauri North Medium Density provisions or the general inclusionary zoning

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						<p>WHI respectfully submits that given the lack of specificity about the affordable housing provisions and how they will be implemented, it is not possible to have any degree of confidence that housing that is actually affordable will be delivered.</p> <p>WHI submits that merely increasing the number of market priced homes available as is described in 10.2.5 may simply increase the number of unaffordable homes available in Hamilton - so encourage incorporation of provisions that make clear how TGH intends to achieve the objective stated in 1.0 and 5.1.1.</p> <p>Whilst the PC12 hearing process has not yet concluded, WHI submits that the direction of travel in regards affordable housing is clear and evidenced in the inclusion of specified provisions and definitions for Te Awa Lakes and Rotokauri North.</p> <p>WHI therefore submits that definitions and provisions specifying affordable housing to be delivered as part of the acceptance of the Proposed Plan Change 15 in the manner of the Te Awa Lakes Medium Density Residential Zone chapters would serve to give effect to the Plan's stated objectives under 1.0 and 5.1.1 in a manner more likely to succeed than the wording currently proposed in 10.2.5. And if so, WHI would be in support of that as making a meaningful difference and achieving TGH's stated aspirations in this Proposed Plan Change.</p>	<p>examples based on Queenstown Lakes District Council provisions.</p>