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Cc: "Cathy O'Callaghan" <cathy.ocallaghan@southwaikato.govt.nz>; "Patrick McHardy" <patrick.mchardy@southwaikato.govt.nz>
Subject: Waikato Regional Council submission on the Proposed Plan Change 4 to the South Waikato District Plan
Attachments: Waikato Regional Council Submission on Proposed Plan Change 4 to the South Waikato District Plan.pdf

Kia ora,

Thank you for the opportunity to make a submission on the Proposed Plan Change 4 to the South Waikato District Plan. Please find attached the Waikato Regional Council's submission.

Waikato Regional Council looks forward to being involved in the further stages regarding this plan change and is open to resolve any aspects of this submission when appropriate.

Should you have any queries regarding the content of this document please contact myself or Naomi Crawford (Naomi.Crawford@waikatoregion.govt.nz).

Please confirm receipt.

Ngā Mihi,
Joao Paulo Silva

Joao Paulo Silva | SENIOR POLICY ADVISOR | Policy Implementation, Science, Policy and Information
WAIKATO REGIONAL COUNCIL | Te Kaunihera ā Rohe o Waikato
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File No: 25 12 00
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2 September 2026

South Waikato District Council
Private Bag 7, Tokoroa 3444

Email: submissions@southwaikato.govt.nz

Dear Sir/Madam

Waikato Regional Council Submission to Proposed Plan Change 4 – Urban Growth (PPC4) to the South Waikato District Plan

Thank you for the opportunity to make a submission on the Proposed Plan Change 4 – Urban Growth (PPC4) to the South Waikato District Plan. Please find attached the Waikato Regional Council's (WRC's) submission. This submission was formally endorsed by WRC's Submission Sub-Committee on 2 September 2026. We look forward to being involved in the further stages of this process**.**

Should you have any queries regarding the content of this document please contact Joao Paulo Silva, Senior Policy Advisor, Policy Implementation directly on [redacted] or by email joaopaulo.silva@waikatoregion.govt.nz.

Regards,

Tracey May
Director Science, Policy and Information

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Submission from Waikato Regional Council on Proposed Plan Change 4 – Urban Growth (PPC4) to the South Waikato District Plan

2 September 2026

Introduction

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to Proposed Plan Change 4 – Urban Growth (PPC4). WRC's primary interest is in relation to the Waikato Regional Policy Statement (WRPS). District Plans, including Plan Changes such as this one, are required to give effect to the WRPS (RMA s75(3)(c)).

2. WRC supports the intent of PPC4 to provide sufficient residential, commercial and industrial development capacity to meet anticipated growth demands across the South Waikato District. We also acknowledge that PPC4 contains a strengthened natural hazards framework, including new provisions relating to flood hazards, liquefaction, natural hazard assessments, infrastructure planning, future urban areas, and climate change considerations. Further, we appreciate the initiative from South Waikato District Council (SWDC) staff to proactively engage with WRC staff on matters regarding this plan change.

3. WRC has a statutory role in the identification, management and reduction of natural hazard risk across the Waikato Region through its responsibilities for flood protection and drainage schemes, river and catchment management, regional-scale natural hazard planning, and emergency management. Therefore, we have a strong interest in ensuring that land use and development decisions do not increase exposure to natural hazards, in particular flooding, or create additional risks and costs for current and future communities.

4. WRC and territorial authorities are also tasked with the integrated management of highly productive land and the strategic integration of land use and infrastructure planning for the region. We consider that several matters require further consideration to ensure better alignment with the WRPS, including that urban growth, greenfield development and intensification does not create new natural hazard risk, increase community exposure to flooding, undermine climate resilience, or result in increased long-term costs for communities and future ratepayers through the need for hazard mitigation, infrastructure upgrades, flood protection or climate adaptation responses.

5. WRC notes that the section 32 evaluation does not yet clearly demonstrate how the cumulative implications of flood risk, flood storage loss, climate change and future infrastructure costs have been assessed across all proposed growth cells. In the absence of this information, it is difficult to determine whether the scale and location of the proposed rezonings represents the most appropriate way to achieve the purpose of the RMA. WRC's primary concern is not the principle of urban growth itself, but ensuring that the location, extent and timing of rezoning decisions avoid creating new natural hazard risk, do not transfer avoidable costs to future communities, and do not establish development expectations ahead of resolving significant environmental constraints.

Summary

6. This submission, in summary:
    a) Seeks clarity in terms of the actual land area of each proposed area of rezoning, to enable clear understanding of the proposal.
    b) Raises concerns regarding flooding within and adjoining proposed growth cells and recommends appropriate setbacks for managing these issues.
    c) Partially opposes the rezoning of the growth cell located at Princess Beatrix Avenue due to the high risk of flooding in parts of the cell.

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d) Proposes including setbacks to a range of the proposed growth cells directing development away from any flooding risks, natural watercourses or wetlands, and recommends ensuring there is safe flood-free access to all cells.
e) Recommends that the rezoning of the proposed industrial FUZ cell at State Highway 27 in Tīrau should be properly assessed under Policy 5 and Clause 3.6 of the National Policy Statement for Highly Productive Land (NPS-HPL).
f) Provides a table seeking amendments to a range of chapters and provisions to reach better alignment with the WRPS and national direction as well as supporting some provisions.
g) Provides an attachment displaying our current (Work in Progress) flood modelling for Tīrau, Putāruru and Tokoroa, highlighting the PPC4 proposed growth cells for the three towns and the associated flooding issues.
h) Seeks stronger policy direction to avoid creating new natural hazard risk and better align district plan provisions with relevant WRPS natural hazard policies and methods.
i) Recommends greater consideration of cumulative flood risk effects, residual risk areas and the long-term implications of urban development on future flood protection and hazard management responses.
j) Seeks improved consideration of infrastructure resilience, climate adaptation, stream corridors and riparian margins as part of future urban development.
k) Recommends improved integration between subdivision, hazard management and future urban development provisions to ensure that future growth occurs in locations that can be safely and sustainably developed.

Natural Hazards

Due to flooding concerns, **we partially oppose** the rezoning for the proposed cell at Princess Beatrix Avenue in Tokoroa.

We partially oppose the rezoning of Growth Cell 1 and adjoining FUZ in Tokoroa **and recommend** SWDC delineates setbacks of at least 25m, directing development away from any flooding risks, natural watercourses or wetlands for a range of the areas proposed to be rezoned and ensuring that there is safe flood-free access to all cells before rezoning.

We recommend assessing the ecological attributes of Growth Cell 1 as well as the adjoining FUZ area in Tokoroa at the plan change stage to ensure certainty around the environmental constraints of the site.

7. New development within flood-prone areas increases natural hazard risk by increasing the number of people, buildings, assets and critical infrastructure exposed to flooding. While the underlying flood hazard may remain unchanged, additional development can increase the consequences of flood events, including risks to human safety, property damage, disruption to transport and essential services, and costs associated with emergency response and recovery. Development can also create pressure for future flood protection measures and may reduce the ability of communities and local authorities to adapt to changing hazard conditions, including those arising from climate change. Where development occurs in hazard-prone areas, the long-term burden of managing and responding to risk is often transferred to future communities and ratepayers.

8. In general, we consider that development and associated activities within any identified 100-year flood hazard area as well as any areas containing natural watercourses or wetlands should be avoided. Development in these areas creates a range of issues, including potentially placing people and property under risk and creating a false sense of certainty from the zoning. The zoning creates an assumption that all environmental constraints, including ecological matters and natural hazards have been assessed and therefore the site is ready to be developed. Rezoning land without identifying all environmental constraints at the plan change stage leaves all issues to be addressed at the resource consenting stage which is not ideal. We recommend SWDC makes it clear when rezoning land that

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certain areas, including parcels of growth cells, must be avoided. This would help inform potential buyers and developers prior to purchasing land of challenges.

9. Attachment 1 to this submission displays our current flood modelling for Tīrau, Putāruru and Tokoroa, highlighting the PPC4 proposed growth cells for the three towns. Please note that our modelling is at phase 1 of our regional flood modelling project and is still a 'Work in Progress'[1]. Although this is under development it displays our best available information[2] providing a good indication of overland flow paths' depths and where flood may occur.

10. WRC considers that rezoning should generally occur only where sufficient information is available to demonstrate that natural hazard constraints can be appropriately avoided or managed and that development can proceed without creating unacceptable levels of risk. Where significant uncertainty remains regarding flood extent, flood storage, overland flow paths, infrastructure performance or climate change impacts, rezoning may be premature.

11. We have identified concerns regarding flooding risks in connection with PPC4. Our model shows that there are overland flow paths, ephemeral streams or creeks and potentially wetlands with depths potentially greater than 1.5m within some of the proposed growth cells as well as around most of the cells (we have listed these cells at paragraph 15). This creates constraints for developing the cells and for ensuring safe flood-free access to the cells. Further, we have specific concerns for the proposed cell for rezoning at Princess Beatrix Avenue and Growth Cell 1 and adjoining Future Urban Zone (FUZ) in Tokoroa.

12. In terms of the of the growth cell proposed to be rezoned at Princess Beatrix Avenue our model shows that the area proposed to be rezoned from rural zone to General Residential Zone (GRZ) is within an area with high risk of flooding that covers parts of the proposed cell and the accesses to the growth cell (please see Figure 1 below). We acknowledge that there are already residential units within the proposed cell and the rezoning would provide a more fit for purpose zoning mechanism for the area. However, the rezoning can also increase the number of residential units exposed to flood risks; the proposed GRZ will facilitate subdivision and the increase of residential development in the area. For example, the proposed provisions are enabling 300m² lot sizes as a controlled activity in the GRZ, and this poses greater likelihood of placing more people under significant risk. This is contrary to the policy direction under the WRPS (HAZ-01, HAZ-P1 and HAZ-P2). Therefore, we partially oppose the rezoning for the proposed cell at Princess Beatrix Avenue. We consider that parts on the eastern side of Princess Beatrix Avenue must not be rezoned (lots 4-12 and 5 – as per figure 2 below). The western side of Princess Beatrix Avenue could potentially be rezoned if SWDC can ensure safe and flood free access to the site and avoid the areas exposed to flooding risk at lots 9 and 11.

[1] Waikato Regional Council: Position Statement on Provision of Natural Hazard Information for LIMs

[2] NPS-NH: *'**Policy 5:** Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.'*

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Figure 1 – WRC phase 1 modelling for the prosed rezoning at Princess Beatrix Avenue

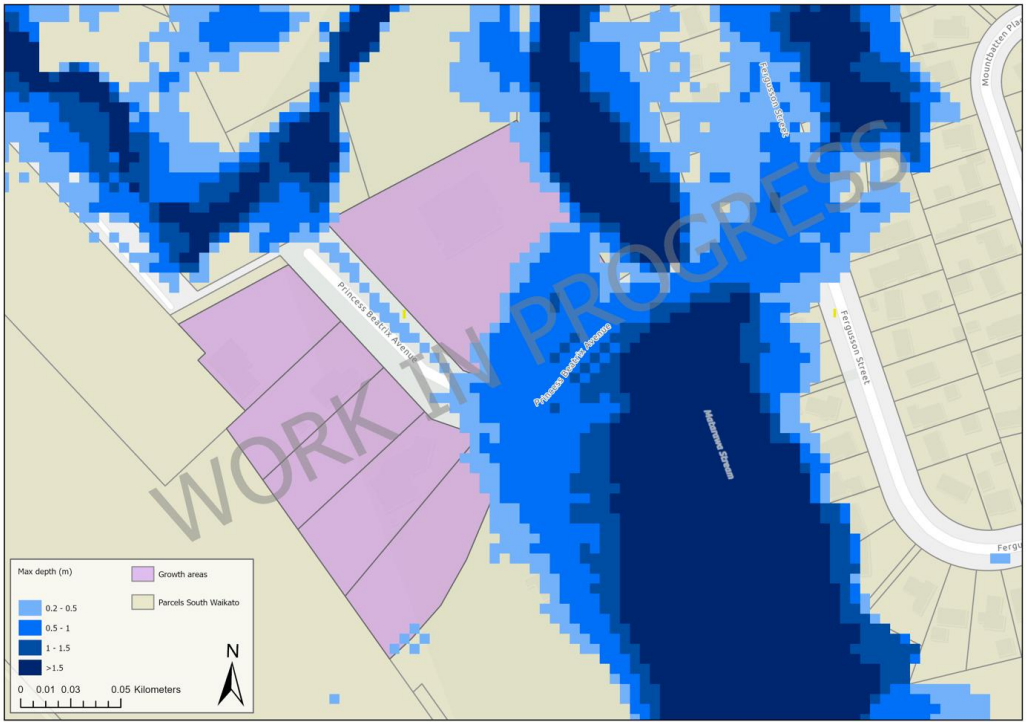
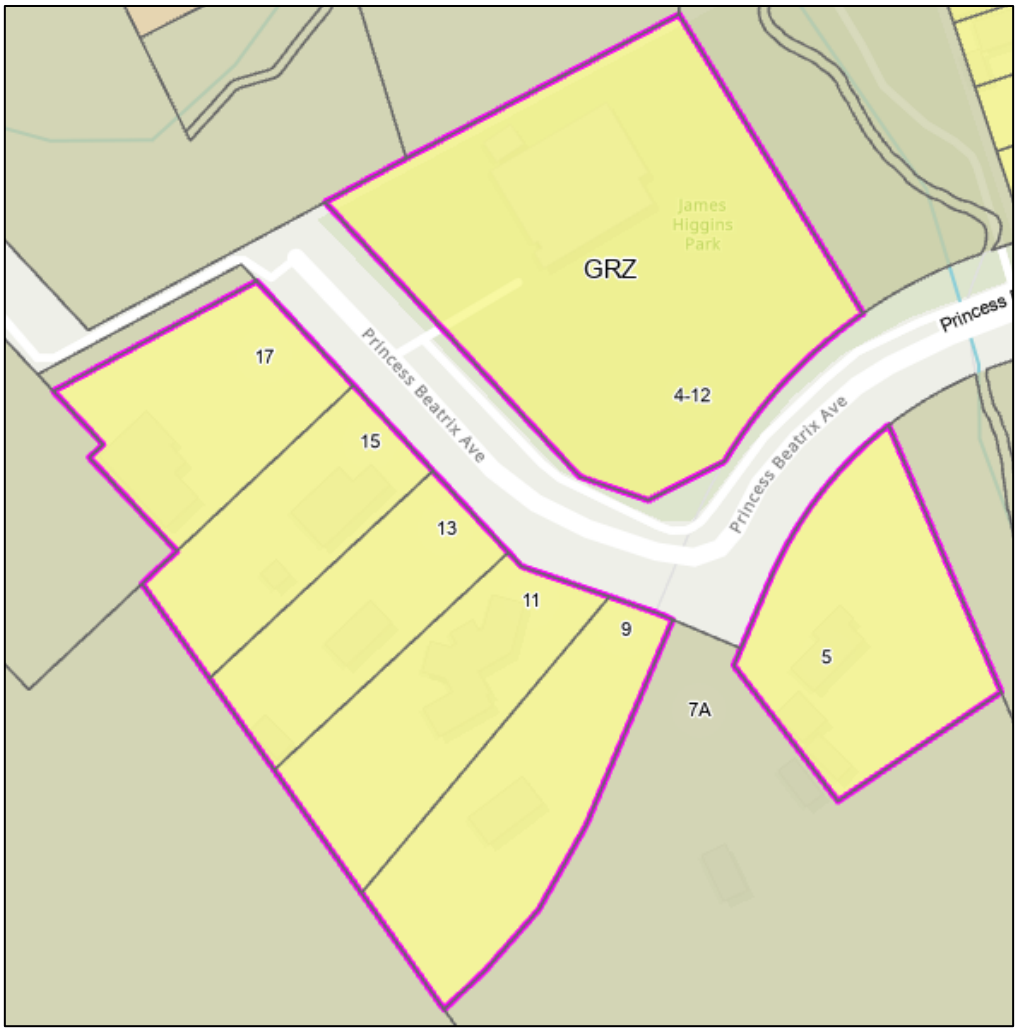


Figure 2 – an extract from the digital map for PPC4 – areas proposed to be rezoned showing the proposed cell to be rezoned at Princess Beatrix Avenue



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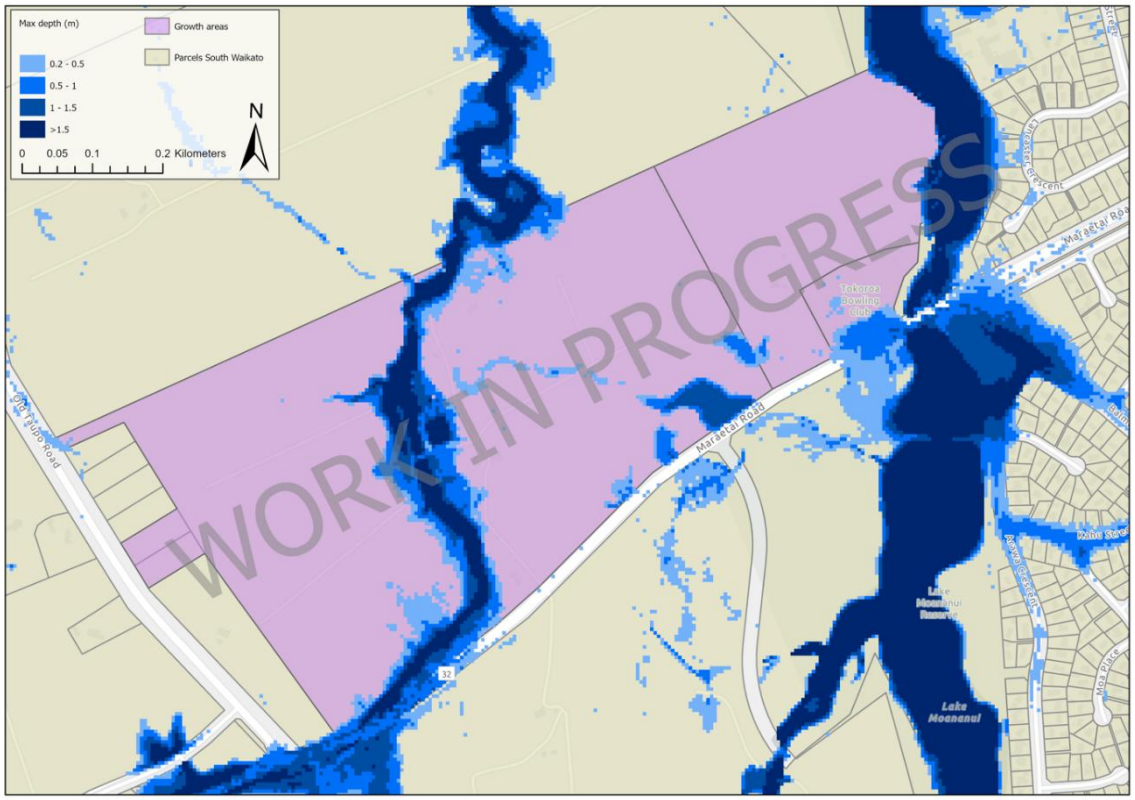
13. We have also identified concerns in terms of Growth Cell 1, and the adjoining proposed FUZ in Tokoroa. Our model shows a stream running through the middle of Growth Cell 1 with significant depths (>1.5m) as well as adjoining the proposed FUZ. There are also spots of ponding water within Growth Cell 1 and concerns in terms of access to the areas. Currently both accesses to the cells are exposed to flood risk. Therefore, **we recommend** SWDC delineates specific setbacks of at least 25m (in alignment with the proposed PPC4 rules in Natural Hazards chapter) directing development away from any flood risks, natural watercourses or wetlands and ensuring that there is safe flood-free access to the cells before rezoning it.

Figure 3 – Proposed rezoning for Growth Cell 1, and adjoining proposed FUZ area



14. Additionally, we note that bats have been recorded within 1km east of the stream at Growth Cell 1 and larger trees (appearing to be mostly deciduous hardwoods) are available for roosting on the property. Bats use waterways for commuting/feeding and therefore it is important to ensure appropriate surveys and mitigation measures are in place. From a desktop perspective there also appears to be wetland attributes associated with the stream and a few along SH32. Therefore, we recommend assessing the ecological attributes of the sites prior to any development and preferably at the plan change stage.

15. We also recommend applying the approach for at least 25m setbacks for all the other growth cells with potential risk of flooding (either within the cells or adjoining) and ensuring that there is safe flood-free access to all cells before rezoning. We consider that the following cells have flooding concerns either within, adjoining or in connection to access:
    - Proposed Growth Cells 2 and 3 in Tokoroa
    - Proposed FUZ at Paraonui Road in Tokoroa
    - Proposed RLZ at Alexander Crescent and Growth Cell 5 in Putāruru
    - Proposed FUZ near Totara Street in Putāruru
    - Proposed Growth Cells 2 and 3 in Tīrau
    - Proposed FUZ at Parapara Road in Tīrau and
    - Proposed industrial FUZ at State Highway 27 in Tīrau

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Table – Submission points to the Proposed Plan Change 4 – Urban Growth (PPC4)

Provision	Support/ Oppose	Submission	Relief sought
1. General			
Growth Cells and Future Urban Areas	Oppose in part	The proposed plan change and supporting documents do not identify the size of each proposed growth cell or the total areas of land proposed to be rezoned to Residential, Future Urban and Rural Lifestyle Zones in each town. This information is necessary to understand how the proposed plan change compares to the demand for residential and business land identified in the South Waikato District Council (SWDC) Housing and Business Capacity Assessment 2023 (HBA) and to complete assessments against relevant provisions of the WRPS, National Policy Statement on Urban Development 2020 (NPS-UD) and National Policy Statement for Highly Productive Land 2022 (NPS-HPL); particularly Clause 3.6(5) of the NPS-HPL. WRC's submission to the Draft South Waikato Growth Plan 2024-2054 highlighted concerns that significantly more land was identified for development than the demand figures in the HBA indicate is required. Concerns identified in the submission included: • The concept of a "hidden shortfall" of housing capacity being used to justify an oversupply of residential land, with limited analysis or quantification • Lack of alignment with WRPS policy direction (e.g. APP11) relating to compact urban form • Long-term costs associated with greenfield growth, such as maintenance costs associated with additional public infrastructure • The potential for large amounts of greenfield rezoning to act as a disincentive for urban infill/intensification • Loss of highly productive land and alignment with Clause 3.6(5) of the NPS-HPL. We note that since the adoption of the Growth Plan, SWDC has undertaken further investigation and refined and amended proposed growth cells, in response to constraints, opportunities and statutory requirements (an	Amend the plan change documentation, section 32 evaluation and supporting material to clearly identify the land area associated with each proposed rezoning to Residential, Future Urban and Rural Lifestyle Zones, and assess: • The economic effects of the proposed plan change • How the areas and timing of proposed rezonings compare to the demand for housing and business land identified in the HBA • Whether the proposed plan change gives effect to the relevant requirements of the WRPS, NPS-UD and NPS-HPL. Make any consequential amendments to the proposed rezonings necessary to give effect to these higher-order instruments.

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Provision	Support/ Oppose	Submission	Relief sought
		approach we support). However, without clear identification of the size of the growth cells proposed to be rezoned through PPC4, it is not possible to assess whether the above concerns identified in WRC's submission to the Growth Plan have been addressed, or to determine whether the plan change aligns with the relevant higher-order policy documents under the RMA.	
Growth Cells and Future Urban Areas	Oppose in part	While PPC4 recognises hazard assessment and mitigation, WRC suggests greater demonstration that proposed growth areas have been selected and designed to avoid significant hazard risk where practicable, consistent with the risk reduction outcomes sought by the WRPS and National Policy Statement for Natural Hazards. It is unclear whether the risk matrix was applied to determine the level of flood risk associated with each proposed growth area, despite some of the growth areas being identified on the current district plan maps as being within the 100-year flood extent.	Amend relevant provisions of PPC4, including the relevant growth cells, Future Urban Zone, zoning, structure planning and supporting assessment provisions, to demonstrate that urban growth is directed away from areas subject to significant or unacceptable natural hazard risk.
Growth Cells and Future Urban Areas	Oppose in part	A range of the proposed areas for rezoning are in or contain portions of Land Use Capability (LUC) Class 3 in the New Zealand Land Resource Inventory (NZLRI). We consider that to give effect to Clause 3.6(5) of the NPS-HPL the competitive margins under Clause 3.22 of the NPS-UD must not be applied. SWDC is not identified as a Tier 1 or 2 local authority and therefore is not required to give effect to Clause 3.22 of the NPS-UD.	Do not apply competitive margins to the rezoning of the proposed Growth Cells and Future Urban Areas when applying Clause 3.6(5) of the NPS-HPL in connection with LUC Class 3 land.
Proposed industrial FUZ cell for rezoning at State Highway 27 in Tīrau	Oppose in part	We have identified that proposed industrial FUZ cell for rezoning at State Highway 27 in Tīrau is in land classified as Class 2 in the NZLRI LUC system. The Section 32 report mentions that the area is already subject of granted resource consent for mining activities and notes Clause 3.9(2)(j)(iv) presumably from the NPS-HPL. We consider that currently the parcel meets the definition of highly productive land under Clause 3.5(7) of the NPS-HPL and the definition of High-Class Soils under the WRPS, therefore this proposed rezoning should be assessed through the appropriate process for rezoning under the NPS-HPL, i.e. Policy 5 and Clause 3.6. The NPS-HPL does not prescribe for exclusions for rezoning land that is already consented. In our view, Clause 3.9 of the NPS-HPL applies exclusions for inappropriate use and development, not for rezoning.	Provide an assessment of the rezoning of the proposed industrial FUZ cell at State Highway 27 in Tīrau using the appropriate process under Policy 5 and Clause 3.6 of the NPS-HPL.

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Provision	Support/ Oppose	Submission	Relief sought
		We consider that the productive capacity of the land is still there if the mining activity has not progressed and the rezoning would enable any industrial development (other than mining). Therefore, it is important to properly assess the rezoning so we can fully assess the merits of the proposal. This will also ensure better alignment with the WRPS development principles (Appendix 11(h) and WRPS LF-04 and LF-P11.	
Growth cell proposed to be rezoned at Princess Beatrix Ave in Tokoroa	Oppose in part	Our model shows that the area proposed to be rezoned from rural to residential is within an area with high risk of flooding. We consider that parts of the proposed cell as well as the access to the cell are subject to flood risks. This is contrary to the policy direction under the WRPS (HAZ-01, HAZ-P1 and HAZ-P2). Please see the full narrative at paragraph 12 of this submission.	Do not rezone lots 4-12 and 5 (as per figure 2 in WRC's submission above) and ensure that there is safe flood-free access to the cell before rezoning the remainder of the cell.
Growth Cell 1, and the adjoining proposed Future Urban Zone (FUZ) in Tokoroa	Oppose in part	Our model shows a stream running through the middle of Growth Cell 1 with significant depths (>1.5m) and adjoining the proposed FUZ. There are also spots of ponding water within Growth Cell 1. This is contrary to the policy direction under the WRPS (HAZ-01, HAZ-P1 and HAZ-P2). Please see the narrative at paragraph 13 of this submission. Additionally, we consider that there could be ecological values present at the parcel. Please see the narrative at paragraph 14 of this submission.	Implement setbacks of at least 25m (in alignment with the proposed PPC4 rules in Natural Hazards chapter) directing development away from any flood risks, natural watercourses or wetlands and ensure that there is safe flood-free access to the parcels before rezoning. Provide an ecological assessment of the site identifying all ecological values.
A range of the proposed growth cells to be rezoned	Oppose in part	Our model shows that the following proposed growth cells have flooding concerns either within or adjoining or in connection to access for the parcels; this is contrary to the WRPS policy direction (HAZ-01, HAZ-P1 and HAZ-P2). We also recommend applying the approach for at least 25m setbacks for the other growth cells with potential risk of flooding (either within the cells or adjoining) and ensuring that there is safe flood-free access to all cells before rezoning. We consider that the following cells have flooding concerns either within, adjoining or in connection to access: • Proposed Growth Cells 2 and 3 in Tokoroa • Proposed FUZ at Paraonui Road in Tokoroa • Proposed RLZ at Alexander Crescent and Grouth Cell 5 in Putāruru	Delineate setbacks of at least 25m (in alignment with the proposed PPC4 rules in Natural Hazards chapter) directing development away from any flood risks, natural watercourses or wetlands and ensure that there is safe flood-free access to the parcels before rezoning.

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Provision	Support/ Oppose	Submission	Relief sought
		• Proposed FUZ near Totara Street in Putāruru • Proposed Growth Cells 2 and 3 in Tīrau • Proposed FUZ at Parapara Road in Tīrau and • Proposed industrial FUZ at State Highway 27 inTīrau	
Hazard assessment provisions	Oppose in part	Many of the proposed objectives and policies rely on "adequate assessment" of natural hazards at the subdivision and development stage. While hazard assessment is important, it does not necessarily prevent the creation of new exposure to hazard risk. Policy HAZ-P1 of the WRPS prescribes that risks are managed using an integrated and holistic approach avoiding the creation of new intolerable risk. Therefore, we recommend providing for a more robust policy framework avoiding development in association with significant flood risk and the creation of new hazard risk.	Provide stronger policy direction requiring urban development to avoid significant flood risk and the creation of new natural hazard risk where practicable, rather than relying primarily on assessment and mitigation measures after rezoning has occurred.
Cumulative flood risk effects	Support in part	The Section 32 Report assesses individual growth areas but provides limited consideration of cumulative effects arising from multiple growth cells and increased development intensity across the district. Assessing the cumulative effects of hazards is required to give effect to methods HAZ-M11 and HAZ-M13 of the WRPS to ensure that development do not create or exacerbate natural hazard risks elsewhere. We consider that SWDC must understand the overall cumulative risks to control piecemeal subdivision effects.	Provide an assessment of the cumulative natural hazard effects arising from the combined rezoning and development of all growth cells, including effects on flood storage, stormwater network performance, overland flow paths, downstream flooding, residual risk and future adaptation costs. Amend provisions throughout the plan to identify and recognise the impact of cumulative increases in risk arising from intensification of urban land.
Infrastructure Resilience	New provisions	PPC4 contains a number of provisions addressing infrastructure capacity and sequencing. However, there is limited assessment of infrastructure performance and resilience during hazard events in alignment with WRPS HAZ- 01, HAZ-M14, EIT- P1 and method EIT-M1.	Include infrastructure resilience provisions, including consideration of flood resilience of transport networks, wastewater and stormwater network performance during flood events, and long-term infrastructure adaptation requirements.
Residual risk zones	Oppose	WRPS method HAZ-M-12 requires that district plans shall identify residual risk zones and control subdivision, use and development within these zones so that residual risk is minimised. These zones do not appear to have been identified.	Identify residual risk zones and include provisions to control subdivision, use and development within these zones.

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Provision	Support/ Oppose	Submission	Relief sought
Future Expectations for Flood Protection and River Management Works	Oppose	Urban development within or near flood-prone areas can create future expectations for structural flood mitigation works and increased flood management intervention. Development decisions made today can influence future expectations regarding flood protection, river management and public investment in hazard mitigation. We consider that methods HAZ-M10 to HAZ-M14 of the WRPS must be fully considered and applied through the plan.	Consider long-term implications as part of growth management and natural hazard decision-making and amend or include provisions as needed.
Urban Heat	Oppose	Climate change is expected to result in higher temperatures, more frequent heat events and increased drought pressure across the Waikato Region. Regional climate change assessments identify drought and increasing temperatures as significant future climate hazards. Higher development densities, smaller allotments and increased building coverage may reduce opportunities for urban greening, mature tree establishment, and shading.	Consider how future urban form, tree canopy cover, green infrastructure and public open space can contribute to climate adaptation, urban cooling and drought resilience outcomes across existing and future urban areas and amend or include provisions as needed as per WRPS Appendix 11(p).
Future Urban Zones	Support in part	Future Urban Zones appropriately restrict premature subdivision and development. However, the application of Future Urban zoning may create expectations that urbanisation will eventually occur. Future modelling may indicate the presence of hazard risk.	Future Urban zoning should not create a presumption that future urbanisation will occur. The suitability of future rezoning should remain dependent on demonstrating that natural hazard risks and infrastructure, ecological and highly productive land constraints can be appropriately addressed.
Stream Corridors and Riparian Margins	Oppose	Several growth areas are located near streams, drainage features and river corridors. These areas can provide important flood conveyance, ecological and amenity functions.	Consider opportunities to protect and enhance stream corridors, riparian margins and associated ecological values as urban areas expand and intensify and amend or include provisions as needed as per WRPS Appendix 11(k).
Planning Maps	Oppose in part	There are several rules and a new definition for high-risk flood zone, but there are no maps accompanying the plan change to show where the high-risk flood zone is and therefore where these rules might apply.	Provide planning maps to show where the low, medium and high-risk flood zones are across the district. Include other hazard types and areas where data and information are available.

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Provision	Support/ Oppose	Submission	Relief sought
2. Chapter 6 – Matters of Strategic Direction			
UFD-01	Support in part	We consider that the objective should also support development in existing urban areas in preference to creating new ones at letter (h). This will achieve better alignment with WRPS development principles under Appendix 11 (APP 11) (a) and (c).	Amend the objective at (h) to include wording supporting development in existing urban areas in preference to creating new ones as it follows or to similar effect: *(h) support existing urban areas in preference to creating new ones and make use of opportunities for urban intensification and redevelopment to minimise the need for urban development in rural areas; …*
UFD-02 and UFD-03	Support	The objectives support several development principles under APP 11 of the WRPS.	Retain
New objective	Support	The objectives in the chapter are silent in terms of natural hazards. We recommend including a new objective addressing natural hazards to reach better alignment with the WRPS. Preferably, the new objective should reflect objective HAZ-01 of the WRPS: *'The effects of natural hazards on people, property and the environment are managed by:* *1. increasing community resilience to hazard risks;* *2. reducing the risks from hazards to acceptable or tolerable levels; and* *3. enabling the effective and efficient response and recovery from natural hazard events.'* We recognise that the Natural Hazards (NH) chapter provides more specifically for natural hazards. However, the objectives in the NH chapter are of different content (than the proposed new objective) and we consider it appropriate to address this issue in a strategic way across the district.	Include new objective in the chapter addressing natural hazards in alignment with HAZ-01 of the WRPS.
UFD-05 and UF-06	Support	The objectives support development principles (e) and (o) under APP 11 of the WRPS.	Retain
UFD-07	Support in part	We consider it appropriate to support Te Ture Whaimana o Te Awa o Waikato (Te Ture Whaimana) at the objectives level as per WRPS APP-11 (r).	Retain

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UFD-P2	Support	The policy is in alignment with some of the development principles under APP 11 of the WRPS, including (m) and (o).	Retain
UFD-P4 and UFD-P5	Support	The policies support some of the development principles under APP 11 of the WRPS, including (d) (e) and (k).	Retain
UFD-P7	Support	The policy supports development principle (q) under APP 11 of the WRPS.	Retain
UFD-P9	Support in part	We agree with the intent of the policy, but we consider it would benefit from rewording in alignment with WRPS HAZ-P1.	Adopt the new proposed wording (or similar) for policy UFD-P9: ~~*Require the design and location of activities to avoid or mitigate natural hazards to an acceptable level of current and future risk to life, property and the environment.*~~ *Ensure that the risks from natural hazards in connection to activities do not exceed an acceptable level and that development avoids the creation of new intolerable risk to life, property and the environment for now and for future generations.*
UFD-P10 to UFD-P13	Support	The policies support a range of principles under APP11 in the WRPS, including (c), (iii), (j) and (n).	Retain
New policy	Support	We recommend including a new policy ensuring that development identifies water requirements necessary to support development and ensure the availability of the volumes required, in alignment with WRPS development principles under APP-11 (f).	Include new policy addressing the need to identify water requirements for development across the district as below or to similar effect: *UFD-PX: Subdivision, use and development must identify water requirements necessary to support development and ensure the availability of the volumes required.*
3. Chapter 7.2 - Infrastructure			
INF-03 and INF-P15	Support	The objective and policy support development principle (d) under APP 11 of the WRPS.	Retain
4. Chapter 8.3 – Natural Hazards			

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New policy	Support	We recommend introducing a new policy addressing the management of natural hazard risk and the effects from subdivision, use and development to ensure better alignment with WRPS HAZ-P1 and HAZ-P2.	Include new policy addressing the management of natural hazard risk and the effects from subdivision, use and development as below, or to similar effect: *Natural hazard risks are managed ensuring that the effects from subdivision, use and development do not exceed an acceptable level of natural hazard risks and avoid the creation of new intolerable risk and are aligned with civil defence approaches.*
Risk management framework	Oppose	We recommend introducing a risk management framework to the district plan consisting of a risk-based approach to the management of subdivision, use and development in relation to natural hazards. The framework should ensure alignment with WRPS method HAZ-M1 (1) to (5): *'HAZ-M1 – Risk management framework* *Regional and district plans shall incorporate a risk-based approach into the management of subdivision, use and development in relation to natural hazards. This should be in accordance with relevant standards, strategies and plans, and ensure that:* *1. new development is managed so that natural hazard risks do not exceed acceptable levels;* *2. intolerable risk is reduced to tolerable or acceptable levels* *3. the creation of new intolerable risk is avoided;* *4. any intolerable risk as a result of existing use and development is as low as reasonably achievable; and* *5. where intolerable risk remains, the risks will be managed until an acceptable level is achieved.'*	Introduce a risk management framework to the district plan consisting of a risk-based approach to the management of subdivision, use and development in relation to natural hazards in alignment with HAZ-M1 (1) to (5).
NH-R4 – DIS activities	Support	WRC supports NH-R4 as it provides an important control on new habitable buildings in the high-risk flood zone by making them a non-complying activity, including on existing allotments and where minor subdivision could otherwise increase exposure to flood hazard risk	Retain
5. Topic 4 – Chapter 11 - Subdivision			

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SUB-O7	Support in part	It is appropriate for the subdivision chapter to include direction on natural hazard risk. However, WRC considers the objective could be strengthened so that it focuses less on the requirement to undertake an assessment and more clearly on the outcome sought from subdivision and development decisions. In particular, the objective should make clear that subdivision and development are to be located, designed and managed to avoid or reduce natural hazard risk, rather than simply requiring that risk be assessed before development occurs. This would reach better alignment with WRPS HAZ- P1 and HAZ-P2.	Amend SUB-O7 as below, or to similar effect: ~~*Prior to the establishment of new subdivision and development, ensure adequate assessment of the natural hazard risk is undertaken.*~~ *Subdivision and development are located, designed and managed so that natural hazard risk is avoided or reduced, and long-term community resilience is maintained.*
SUB-P2	Support in part	We consider that SUB-P2 should be split into two separate policies so that contaminated land and natural hazards are addressed separately. The contaminated land policy should focus on managing risks associated with land contamination, while a separate natural hazards policy should provide clear policy guidance on managing subdivision in areas subject to natural hazard risk.	Include a new policy as below, or to similar effect: *Control subdivision in areas subject to natural hazards to ensure that the location, layout and design of subdivision avoids or reduces risk to people, property and infrastructure, does not create or exacerbate natural hazard risk, and provides safe, stable and flood-free building platforms for future development.*
SUB R5(1) – GRZ and MU-SETZ - Reduction in Minimum Residential Lot Size	Support in part	PPC4 proposes reducing the minimum lot size within the General Residential Zone to 300m² and enabling higher housing densities. While this may improve housing affordability and capacity, it may also increase the number of people, residential units and assets exposed to hazard risk. The subdivision rule will apply across all residential zoned land in the district, including in areas identified as being in the 100 year flood extent on the district planning maps. Cumulative effects may be experienced, particularly in high risk flood zone areas where in-fill development could be occurring under this rule. There is potential ambiguity between the subdivision provisions and the Natural Hazards chapter provisions. The subdivision rule appears to focus on whether a suitable habitable building site can be provided on each allotment, while the Natural Hazards chapter manages the activity status of the building itself. This may create uncertainty about whether subdivision within flood-prone areas, including high-risk flood zones, could enable additional allotments or building sites even where future habitable buildings would be restricted or non-	Amend SUB-R5 to exclude the high risk flood zone from the 300m² minimum residential lot size, and require that subdivision in flood-prone areas is subject to clear requirements demonstrating that each proposed allotment contains a safe and suitable building platform outside areas of unacceptable flood hazard risk. Amend SUB-R5 and related subdivision provisions to clarify their relationship with the Natural Hazards chapter and to ensure that subdivision does not create additional allotments or habitable building sites in areas where future habitable buildings would be restricted or non-complying due to flood hazard risk.

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		complying under the Natural Hazards chapter. WRC considers the provisions should be better integrated so that subdivision does not create new allotments or building expectations in locations where subsequent residential development would be inappropriate due to flood hazard risk. Additionally, while minimum floor levels may reduce building damage, they do not remove the underlying flood hazard or the increased exposure created by additional urban development. Flood mitigation measures such as floor levels should not be used to justify rezoning land that may otherwise be unsuitable for urban development due to flood risk.	
6. Chapter 13.1 – General Residential Zone			
GRZ-02	Oppose in part	We consider that the objective must also provide for opportunities for urban intensification and redevelopment to minimise the need for urban development. This would provide better alignment with the WRPS development principles under APP11 (c).	Amend the objective to also provide for urban intensification and redevelopment to minimise the need for urban development.
GRZ-06	Support in part	The objective seeks to ensure adequate assessment of the natural hazard risk is undertaken prior to the establishment of new residential development. As mentioned above (at the submission point on Hazard assessment provisions), we consider that while hazard assessment is important, it does not necessarily prevent the creation of new exposure to hazard risk. Policy HAZ-P1 of the WRPS prescribes that risks are managed using an integrated and holistic approach avoiding the creation of new intolerable risk. Therefore, we recommend providing for a more robust policy framework avoiding development in association with significant flood risk and the creation of new hazard risk.	Retain but also provide stronger policy direction requiring urban development to avoid significant flood risk and the creation of new natural hazard risk where practicable, rather than relying primarily on assessment and mitigation measures after rezoning has occurred.
R5(3) Building coverage	Oppose	We note PPC4 proposes increasing building coverage from 45% to 55% within the General Residential Zone and up to 60% for duplex and terraced housing developments, while requiring only 20% permeable surface area. Higher site coverage generally can increase stormwater runoff and put pressure on drainage systems. The change to the building coverage and permeable surfaces rule is in addition to the proposal to reduce allotment size in the General Residential Zone. The overall cumulative effect on exposure to flood risk across a wider area does not appear to have been addressed in the section 32 report.	Amend the rule so the higher building coverage and lower permeable surfaces thresholds do not apply in the high-risk flood zone.

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7. Appendix 4 – Information Requirements			
APP-4.1	Support	Having requirements to assess natural hazards are in alignment with policy direction under the HAZ-P2(1).	Retain

Further Information and hearings

WRC wishes to be heard at the hearings for Proposed Plan Change 4 – Urban Growth (PPC4) in support of this submission and is prepared to consider a joint submission with others making a similar submission.

WRC **could not** gain an advantage in trade competition through this submission.

Submitter details

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I could not gain an advantage in trade competition through this submission
I am not directly affected by an effect of the subject matter of the submission that:
(a) does not adversely affect the environment; and
(b) does not relate to trade competition or the effects of trade competition.

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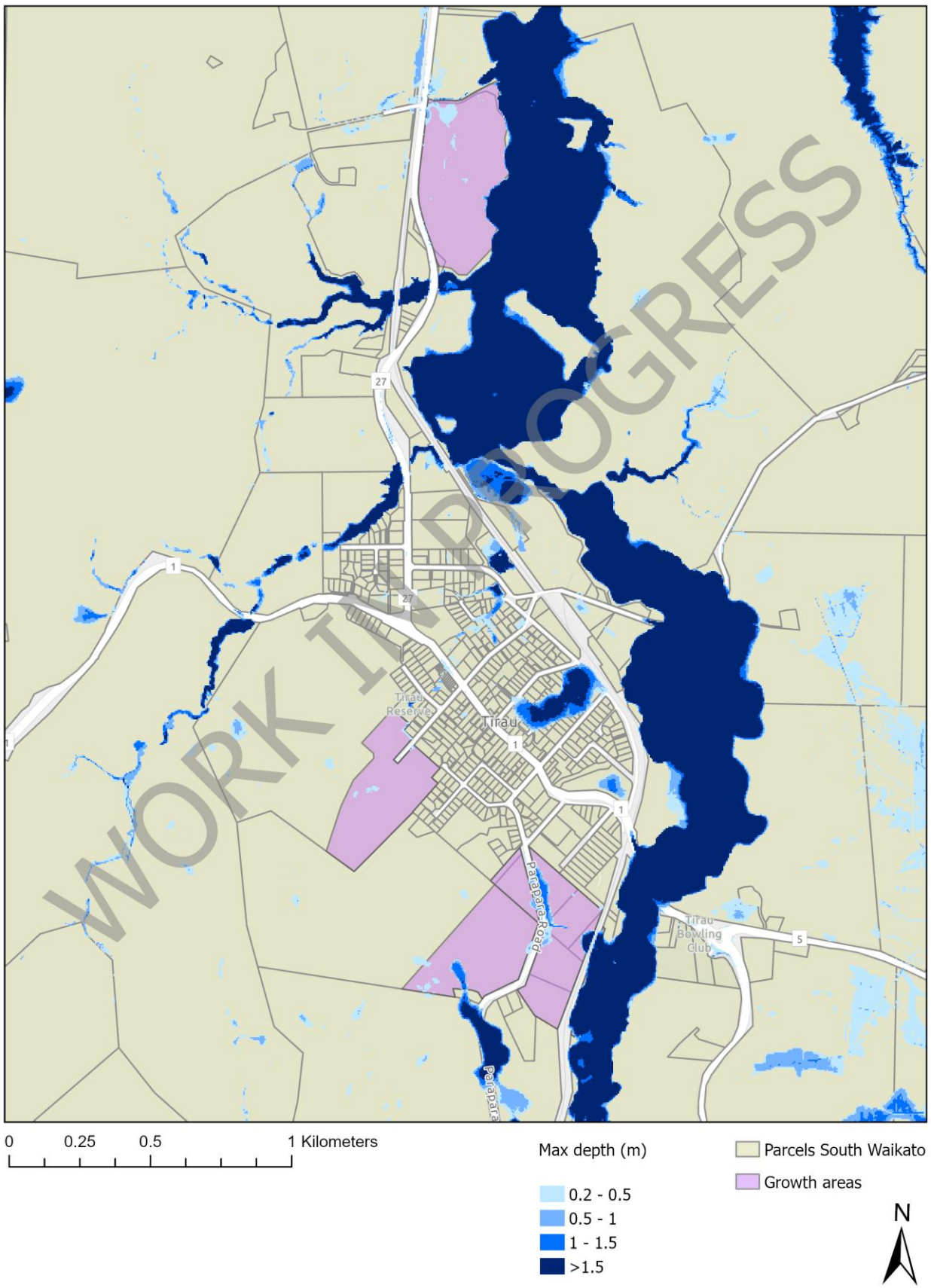
ATTACHMENT 1 – Phase 1 Maximum modelled flood depth for current climate 1% AEP for Tīrau, Putāruru and Tokoroa

PHASE 1 Maximum modelled flood depth for current climate 1% AEP TĪRAU



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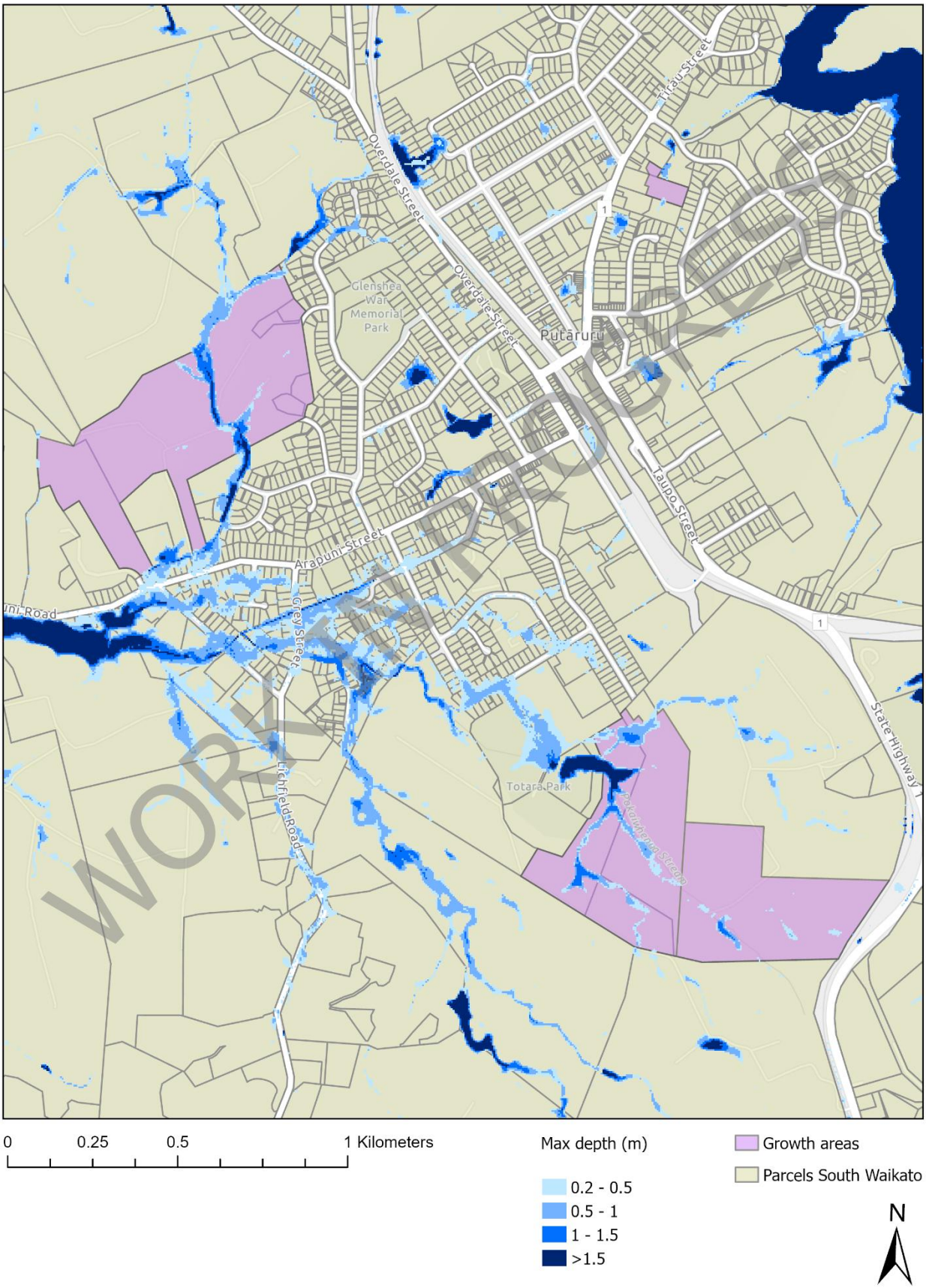
PHASE 1 Maximum modelled flood depth for current climate 1% AEP PUTĀRURU



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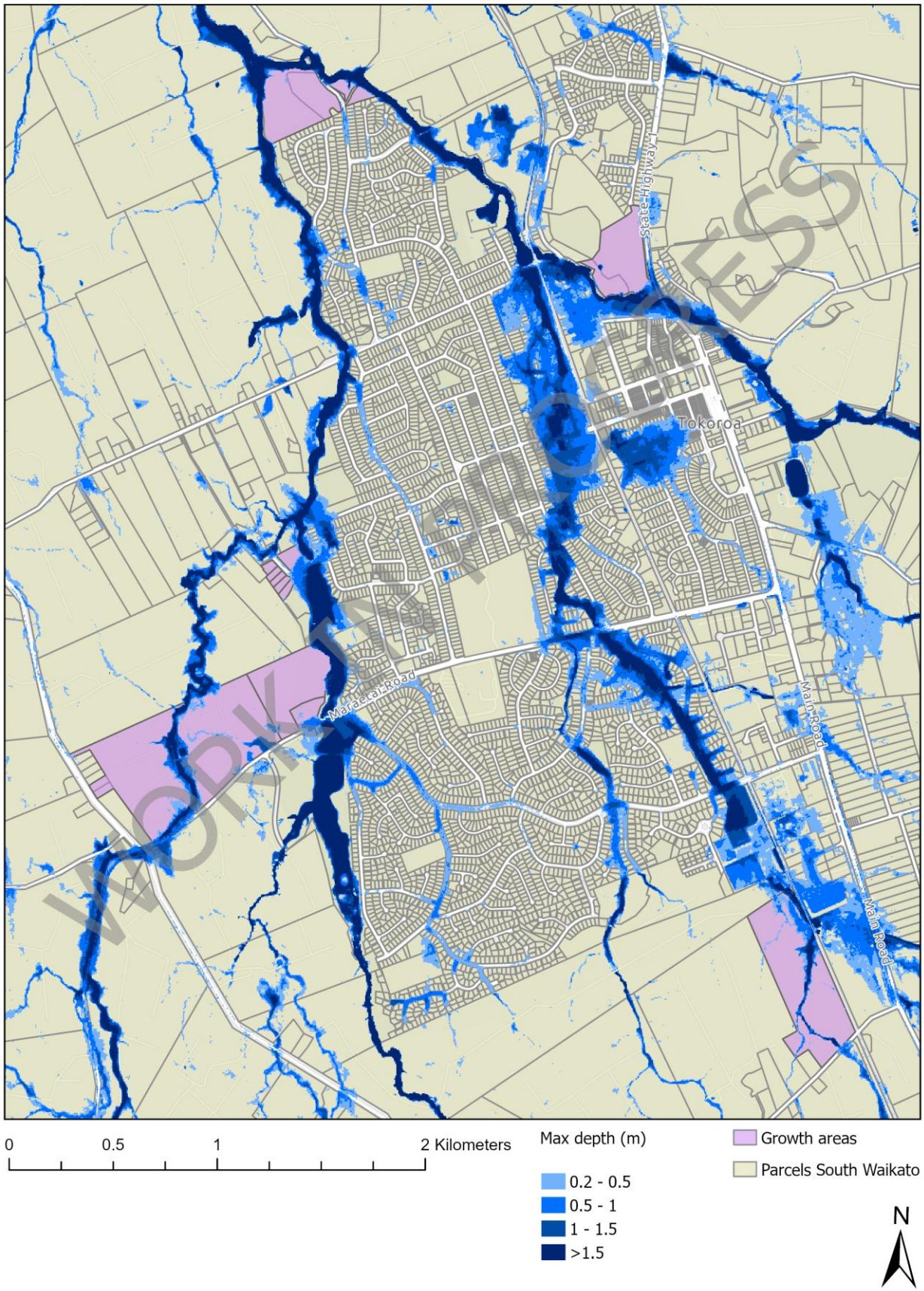
PHASE 1 Maximum modelled flood depth for current climate 1% AEP TOKOROA



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