

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a hearing for the Hamilton City Council Proposed
Plan Change 5: Peacocke Structure Plan

STATEMENT OF EVIDENCE OF HANNAH CRAVEN
For the Waikato Regional Council
DATED 16 SEPTEMBER 2022

Introduction

1. My name is Hannah Craven. I am a Policy Advisor in the Strategic and Spatial Planning team in the Strategic Policy Implementation section at Waikato Regional Council (WRC). I have been in this role since October 2020.
2. I hold a bachelor's degree in environmental planning. I have 2 years of experience in the field of regional policy implementation. I am a graduate member of the New Zealand Planning Institute.
3. As a member of the Strategic and Spatial Planning team for WRC I am involved in implementing the Waikato Regional Policy Statement (WRPS) and working with the territorial authorities of the Waikato Region and with neighbouring regional councils to assist in the development of consistent integrated regional policy.
4. I am involved with the Policy and Planning Working Group for the Future Proof partnership and was involved in recommendations for the recent update of the Future Proof Strategy.
5. I am the Project Manager for the upcoming change to the WRPS to give effect to the National Policy Statement on Urban Development 2020 and incorporate the updated Future Proof Strategy.
6. I confirm that I am familiar with the Code of Conduct for Expert Witnesses as set out in the Environment Court Practice Note 2014. I have read and agree to comply with the Code. Except where I state that I am relying upon the specified evidence or advice of another person, my statement is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Scope of evidence

7. My statement is given on behalf of WRC. My statement reinforces the WRC submission and reflects my professional opinions as a Policy Advisor. I also rely on the opinions of Andrew Carnell, Team Leader of Network Planning and Performance, relating to public transport planning in Peacocke as set out in his statement of evidence¹.
8. The submission made by WRC was prepared by my former team member Matthew Vare, who has since left WRC.
9. WRC staff have been involved in multiple discussions with Hamilton City Council (HCC) staff regarding the Peacocke structure plan and plan change, both throughout its development and through the submission process.
10. I have been in discussions since after submissions closed and have been the main WRC contact relating to the WRC submission. I have been involved in discussions particularly relating to ecology and bats, public transport, and planning and density, including expert conferencing sessions on bats and medium density residential standards (MDRS)/density.

¹ Statement of evidence of Andrew Carnell, 16 September 2022, in the matter of a hearing for the Hamilton City Council Proposed Plan Change 5: Peacocke Structure Plan.

11. My evidence focuses on:
 - Whether single dwellings as a permitted activity are appropriate in the increased height (high density) overlay area.
 - The need for wider ecology and biodiversity matters to be covered in the general standards for subdivision.
12. My assessment is based on the provisions and information supplied in the plan change documents, the policy direction set out in the WRPS, and the Future Proof Strategy².
13. It is my view that some of the plan change provisions as recommended by the Section 42A (s42A) report do not give effect to the WRPS, the Future Proof Strategy, and in some cases, the objectives and policies of the plan change itself.
14. I note that where I refer to plan change provisions, I refer to the amended wording and numbering as set out in Appendix B to the s42A report.

Summary of evidence

15. I support the majority of the s42A report recommendations and appreciate the thorough assessment of the WRC submission and efforts made by HCC to incorporate the WRC submission's recommendations. I do not address provisions I support in my evidence.
16. My recommendations relate to:
 - Single dwellings within the Increased Height Overlay area
 - Consideration of ecological values in subdivision rules
 - Figure 2-2 – Transport network.
17. I consider there is a disconnect between the policies and rules in regard to promoting high density development. Permitting single dwellings within the Increased Height Overlay area is contradictory to the high-density intention of the area. I recommend single dwellings are enabled through a consenting pathway that requires consideration of how the development contributes towards the plan change policies and that they are allowed where appropriate.
18. I support the plan provisions for subdivision in Peacocke, based on the understanding that the Significant Bat Habitat Area is the same as the area zoned Natural Open Space and therefore includes the whole defined ecological network. I consider it important that all ecological values in Peacocke are captured by the matters of discretion and general standards for subdivision, not just bats.
19. I support the recommendations of Mr Carnell to include additional indicative bus stops on Figure 2-2 in Appendix 2 and to ensure the map shows alignment between the indicative bus stops and cycle/walkway network.

² <https://futureproof.org.nz/the-strategy/>

20. My recommendations seek to give effect to the WRPS and have regard to the Future Proof Strategy, as well as ensure better alignment between the objectives and policies and the rule framework of the plan change.

Single dwellings within the Increased Height Overlay area

21. The WRC submission made the point (point 36.1 in the s42A Report, Appendix A³) that allowing single dwellings and duplexes as permitted activities within the high-density residential overlay may undermine the intention of the overlay and not guarantee the desired outcome of compact development in this area. It was recommended that HCC consider whether the activity statuses and development standards of various dwelling types should be differentiated between the medium density zone and the high-density residential overlay, paying particular attention to the suitability of single dwellings as a permitted activity in each.
22. The s42A report⁴ rejected this submission point as below:
“The submitter’s concern that there is potential to undermine the intention of the High Density overlay by allowing single detached dwellings is acknowledged, and DEV01-PSP:P15 (within Chapter 3A) states the importance of this with the wording “Avoid compromising the future delivery of high-density residential activity around the local centre and identified public transport routes with low density development.” The provisions are intended to be enabling of different housing typologies but not to require only some typologies and exclude others. It is anticipated that few single detached dwellings will be constructed in the overlay given the market economics.”
23. Whilst I acknowledge it is not the place of councils to direct the market, there is currently a disconnect between policies DEV01-PSP: P8, DEV01-PSP: P9 and rule MRZ-PREC1-PSP: R3. Allowing single dwellings as a permitted activity in a high-density residential overlay directly conflicts with the intended outcome set by the policies.
24. I consider the plan needs to show a clear alignment between the objectives, policies and the rules. I see no point in having the overlay and strong objectives and policies if the rules do not follow through. There is no opportunity for assessment of, or requirement to give effect to, objectives and policies for permitted activities.
25. Compact development is a key value of the Peacocke Structure Plan area which supports other key values of connectivity and accessibility.
26. Policy DEV01-DSP:P8 sets a density target of 45 dwellings per hectare in the increased height area overlay which aligns with the density for Peacocke set out in the Future Proof Strategy which is 30-45 dwellings per hectare. The strategy underwent a special consultative process under the Local Government Act and has been adopted by all partners, including HCC, and therefore must be had regard to by territorial authorities when preparing or changing a district plan⁴.

³ <https://storage.googleapis.com/hccproduction-web-assets/public/Uploads/Documents/Content-Documents/Property-Rates-and-Building/PC5-Peacocke-Structure-Plan/s42A/Appendix-A/Appendix-A-Summary-of-Submissions-and-Recommendations-v2.pdf>

⁴ Resource Management Act 1991 subclause 74(2)(b)(i)

27. Policy 6.15 of the WRPS seeks to ensure that over time, urban development will become more compact through the promotion of development density targets and outlines the benefits of this approach. These targets were set in alignment with a now outdated version of the Future Proof Strategy. A change to the WRPS is expected to be notified in October 2022 which will update Policy 6.15 to align with the current minimum net density targets of the Future Proof Strategy.
28. Further, WRPS general development principle 6A(i) directs that new development should promote compact urban form, design and location to:
- i) minimise energy and carbon use;
 - ii) minimise the need for private motor vehicle use;
 - iii) maximise opportunities to support and take advantage of public transport in particular by encouraging employment activities in locations that are or can in the future be served efficiently by public transport;
 - iv) encourage walking, cycling and multi-modal transport connections; and
 - v) maximise opportunities for people to live, work and play within their local area;
29. A transport priority for WRC as set out in the Regional Land Transport Plan 2021-2051⁵ and the draft Regional Public Transport Plan 2021-2024⁶ (RPTP) is to promote travel demand initiatives and technology that supports travel behaviour change, mode shift and compact urban form. The draft RPTP is based on the agreed position of an increasingly compact Hamilton to support a rapid and frequent public transport network.
30. I support the amendment to MRZ-PREC1-PSP: R3 which allows two or three residential units on a site, however, note this is required by the RMA (Enabling Housing Supply Amendment) and simply makes the plan change consistent with HCC Proposed Plan Change 12 (Enabling Housing Supply). This amendment assists to enable higher density development.
31. I agree this rule and the wider plan change *enables* medium and high-density development but consider it does very little to *prevent* low density development.
32. With a minimum site area of 300m², it will be easy for developers to choose to develop single dwellings over higher density and HCC will have no control over what proportion of sites are developed with a single dwelling only. I acknowledge that high density or even medium density may not be appropriate across all areas due to location or site constraints.
33. I consider the plan can still enable low density development through a consent pathway without inadvertently encouraging it. I consider single dwellings / one residential unit per site in the increased height overlay area should be a discretionary activity so that applications can be considered on a case-by-case basis through the resource consent process and allowed where site constraints exist.
34. Alternatively, single dwellings / one residential unit per site in the increased height overlay area could be a restricted discretionary activity, subject to the matters of discretion in P –

⁵ <https://waikatoregion.govt.nz/assets/WRC/2021-2051-RLTP.pdf>

⁶ <https://waikatoregion.govt.nz/assets/WRC/Transport/RPTP/draft-RPTP.pdf>

Peacocke Structure Plan. A new matter of discretion would be needed under P3 – Development in the Peacocke Precinct to consider the extent to which development supports the high-density intention and density target of the increased height overlay.

35. I also oppose the amendment to policy SUB - PREC1-PSP: P9. In my opinion, it is appropriate for the policy to require subdivision to provide for higher density residential development. Replacing 'provide for' with 'support' is a watering down of the policy which undermines the purpose of the overlay.

Consideration of ecological values in subdivision rules

36. The WRC submission sought that the scope of the matters of discretion and general standards for restricted discretionary and discretionary subdivision in the Peacocke structure plan area are expanded to include consideration of wider ecology and biodiversity values than just bats (points 36.49 and 36.52 in the s42A Report, Appendix A).
37. Waikato Regional Policy Statement Policies 11.1 and 11.2 (set out in Appendix 2 to this report) require:
- Promotion of positive indigenous biodiversity outcomes to maintain the full range of ecosystem types and maintain or enhance their spatial extent as necessary to achieve healthy ecological functioning of ecosystems; and,
 - Protection of significant indigenous vegetation and the significant habitats of indigenous fauna by ensuring the characteristics that contribute to its significance are not adversely affected to the extent that the significance of the vegetation or habitat is reduced.
38. Whilst I recognise the presence and importance of bats in the Peacocke area, and support the provisions relating to bats, I consider it important that other indigenous flora and fauna are equally protected through the provisions.
39. WRC staff reiterated this concern through written feedback provided on the proposed provisions for bats. These provisions were shared with WRC following a pre-hearing meeting with s42A report author Mr Sharman and other representatives for HCC on ecology matters raised in the WRC submission.
40. The s42A report rejected these submission points as below:
- “Reject, as the first part of the relief has no clear meaning, and the second part is problematic as lacks clarity.”*
- “Reject - this rule cannot be applied more widely with any clarity as sought by the submitter. As an amendment in response to this submission point however, amend 'bat corridor' to 'Significant Bat Habitat Area' as that was the original intent of the provision and 'bat corridors' are not spatially defined on the structure plan diagrams with any specificity.”*
41. I am unsure what part of the relief sought by WRC is problematic or unclear and the lack of clarity of the s42A authors on this point was not raised in pre-hearing discussions or expert conferencing sessions.

42. Subdivision is generally subject to the matters of discretion in C – Character and Amenity and P – Peacocke Structure Plan. I accept that the proposed matters of discretion under P – Peacocke Structure Plan sufficiently cover the relief sought in this submission point. However, I recommend that restricted discretionary subdivision activities in the Peacocke precinct are also subject to the matters of discretion in D – Natural Character and Open Space which will ensure subdivision applications thoroughly assess impacts on ecological values.
43. Also, the general standards for subdivision as recommended in the s42A report do not include any reference to ecological or biodiversity matters aside from bats in SUB-PREC1-PSP: R25. This provision, which is titled “Provision of Ecological Areas” is limited to Significant Bat Habitat Areas. However, I understand that the Significant Bat Habitat Area is the same as the area zoned Natural Open Space and therefore includes the whole defined ecological network.
44. It is based on this understanding that I support SUB-PREC1-PSP: R25 and consider the WRC submission points 36.49 and 36.52 are satisfied.
45. However, I recommend that the explanation for Significant Bat Habitat Areas in Chapter 3A under ‘Components of the Peacocke Structure Plan’ is amended to clarify that this covers the full extent of the defined ecological network or ‘Natural Open Space Zone’ and that other ecological values exist in these areas. This would assist in understanding of the provisions that apply to these areas which are mutually beneficial for both bats and other species.
46. This would also align with the objectives and policies of the plan change, which seeks to protect and enhance all ecological values within Peacocke.

Figure 2-2 – Transport Network

47. I support the recommendations of Mr Andrew Carnell as set out in his evidence which relate to Figure 2-2 – Transport Network in Appendix 2 – Structure Plans of the plan change.
48. The WRC submission sought this map be amended to include additional indicative bus stop locations (point 36.75 in the s42A Report, Appendix A).
49. The Section 42A report rejected this submission point as below:
“Reject. Whilst Figure 2-2 displays ‘key public transport stop’ and ‘future mass transit stop’, these are not intended to be a comprehensive and final set of locations. These are intended as a display of the key public transport hubs anticipated and not individual bus stop locations. The intent of displaying what is shown on Figure 2-2 is to provide a basis for future consultation between developers, HCC and WRC to determine location of specific stops. Further, items (1) and (3) are already included on the construction/tender drawings for these corridors, and item (2) can be determined as part of future subdivision applications.”
50. If the bus stops on Figure 2-2 are indicative, I see no reason why the additional stops recommended by Mr Carnell cannot be included. These recommended stops represent the most appropriate locations at this time as considered by the lead public transport network planner for the region.

51. If the recommended stops are already included on the construction/tender drawings for these corridors I consider that is further reason to show them in the plan.
52. Further, the amendments to Figure 2-2 mean that the indicative bus stops no longer align with the indicative walking/cycling network. I agree with Mr Carnell that the plan should show these as aligned.
53. This would better give effect to WRPS method 6.3.1 which requires district plans to ensure:
 - roading patterns and design support the use of public transport;
 - walking and cycling facilities are integrated with developments; and,
 - the different transport modes are well connected.
54. Method 6.1.8(c) requires district plan zoning for new urban development, and subdivision and consent decisions for urban development, to be supported by information which identifies multi-modal transport links and connectivity and how the efficient functioning of transport will be protected and enhanced.
55. Method 6.3.4 also directs local authorities ensure structure plans are consistent with Policy 6.3 which seeks to coordinate growth and infrastructure. The policy and its methods aim to ensure that the future spatial land use pattern is understood sufficiently to inform future investment in transport infrastructure.

Recommendations

56. I recommend rule MRZ-PREC1-PSP: R3 be amended to be applicable only to the medium density area and for a new rule to be added for the increased height overlay area that allows two or three residential units on a site to be permitted but excludes single residential units as a permitted use. I recommend single residential units on a site in the increased height overlay area be assessed as a discretionary activity.
57. Alternatively, I recommend single residential units in the increased height overlay area be assessed as a restricted discretionary activity, subject to the matters of discretion in P – Peacocke Structure Plan. In this case, I recommend a new matter of discretion under P3 – Development in the Peacocke Precinct to consider the extent to which development supports the high-density intention and density target of the increased height overlay.
58. I recommend policy SUB - PREC1-PSP: P9 be retained as notified with the wording “provide for”, not “support”.
59. I recommend that restricted discretionary subdivision activities in the Peacocke precinct are also subject to the matters of discretion in D – Natural Character and Open Space which will ensure subdivision applications thoroughly assess impacts on ecological values.
60. I recommend that the explanation for Significant Bat Habitat Areas in Chapter 3A under ‘Components of the Peacocke Structure Plan’ is amended to clarify that this covers the full extent of the defined ecological network or ‘Natural Open Space Zone’ and that other ecological values exist in these areas.

61. I support the recommendations of Mr Carnell to amend Figure 2-2 in Appendix 2 to:
- Add an additional bus stop facility on the major arterial in proximity to where it severs Weston Lea Drive.
 - Add an additional bus stop facility to be shown on the minor arterial in proximity to the Peacocke Lane intersection.
 - Amend the indicative cycle/walkway network to align with the indicative bus stop locations or alternatively, retain the indicative bus stop locations as notified.

Conclusion

62. Overall, I support the intent and direction of the plan change and appreciate HCC's and the s42A report authors' efforts to address submissions, including WRC's submission.
63. I support the majority of the s42A report's recommendations.
64. However, I am of the view that some of the plan change provisions as recommended in the s42A report do not give effect to the WRPS, the Future Proof Strategy, and in some cases, the objectives and policies of the plan change itself.
65. My recommendations seek to give effect to the WRPS and have regard to the Future Proof Strategy, as well as ensure better alignment between the objectives and policies and the rule framework of the plan change.



Hannah Craven
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Strategic and Spatial Planning
Waikato Regional Council

16 September 2022

Appendix 1: Relevant provisions of Proposed Plan Change 5: Peacocke Structure Plan (as set out in s42A report recommendations)

DEV01-PSP: Overview and Vision

.. Low density residential development is discouraged.

Ensuring the ongoing integration, protection and restoration of ecology within the urban environment, providing habitat value and a range of ecosystem services such as amenity, open space, shading and cooling, carbon sequestration, connectivity, and water retention and storage.

.. hubs will be supported by areas of higher density residential development, allowing more people to live within walkable catchments of the centres and the public transport network, efficiently using land and infrastructure. This will create a vibrant network of centres within the Peacocke Structure Plan area that will become the heart of the community.

.. a medium and high-density environment is envisaged ..

DEV01-PSP: O1 - The Peacocke Precinct delivers a connected, well integrated, high amenity, medium density residential environment, where higher density development is focused around commercial centres, schools, public transport corridors and areas of open space and natural amenity.

DEV01-PSP: O2 - Urban development protects the area's natural environment, ecological values and responds to natural hazards.

DEV01-PSP: O4 - The Peacocke Local Centre is the primary centre within the structure plan area and provides a range of commercial and community services, as well as high density living opportunities.

DEV01-PSP: O11 Enable development adjacent to ecological areas where it is managed to protect and enhance ecological functions and processes.

DEV01-PSP: P7 - Higher density development in the Peacocke Structure Plan:

1. Shall be established within a walkable distance of the Peacocke Local Centre, neighbourhood centres, identified public transport routes, adjacent to schools, parks and community facilities.
2. May be provided along areas of natural open space including the river corridor and gully network where ecological functions and processes can be protected and enhanced.

DEV01-PSP:P8 - Development of the Peacocke Structure Plan area should aim to achieve a minimum overall net residential density (excludes roads and open space) of 30 dwellings per hectare other than in the Increased Height Overlay area which, in recognition of the additional height enabled, should aim to achieve a minimum overall net residential density of 45 dwellings per hectare

DEV01-PSP:P9 - Avoid compromising the future delivery of high-density residential activity around the local centre and identified public transport routes with low density development.

DEV01-PSP:P10 - Require a variety of housing typologies and densities to be provided throughout the structure plan area.

DEV01-PSP: P37 - The transport network is designed to enable the delivery of a high quality and accessible public transport services.

DEV01-PSP: P40 - A continuous and safe walking and cycling network is established that provides direct connections to activity nodes and public transport within the structure plan that minimises the effects of severance of the gully system and major transport corridors.

MRZ - PREC1- PSP: O4 - The Peacocke Precinct is a well-connected, integrated high amenity, medium density residential environment with areas of higher density around identified activity nodes, corridors and areas of natural amenity.

MRZ-PREC1-PSP: PE - Provide for developments not meeting permitted activity status, while encouraging high-quality developments.

MRZ - PREC1- PSP: P1 - Higher-density residential development should be located within and close to the Local Centre, and Neighbourhood centres, education facilities and, in areas serviced by passenger transport and in close proximity to zoned open space.

MRZ - PREC1- PSP: P17 Residential development shall use land and infrastructure efficiently by:

1. Delivering target yields as indicated in DEV1-PSP: P14.

MRZ-PREC1-PSP: R3 - One, Two or three residential units on a site

Activity Status: Permitted

Where the following are complied with:

PER-1

PREC1-P R34 – R47

SUB - PREC1-PSP: P9 Require subdivision to efficiently use land and to support higher density residential development in walkable distances from the Peacocke Local Centre and identified public transport routes by encouraging subdivision to occur concurrently with or following land development.

SUB - PREC1-PSP: P17 Enable larger lots where they are to be used as a tool to provide for lots that enable future medium or high-density development.

SUB-PREC1-PSP: R25 Provision of Ecological Areas

1) Where subdivision includes Natural Open Space zoned areas identified in the Peacocke Structure Plan area as Significant Bat Habitat Areas, these shall be provided as Local Purpose (Ecological) Reserve or Local Purpose (Esplanade) Reserve and vested in Council in accordance with the Peacocke Structure Plan and be designed to meet the following requirements:

a) Maintain a minimum width of 50m.

Restricted Discretionary, Discretionary and NonComplying Assessment Criteria

D - Natural Character and Open Space

D3 The extent to which activities associated with the proposal will:

e) Cause the loss of habitat that provides a key life-cycle function or the physical disturbance of indigenous species listed as 'threatened' or 'at risk' in the New Zealand Threat Classification Systems Lists.

D4 The extent to which impermeable surfaces adversely affect water quality, and the surrounding watertable.

D10 The extent to which undertaking the activity will enable replacement or enhancement of existing vegetation, natural values, or the improvement of riparian margins.

D15 The extent of the effect of the proposal on:

a) Natural character, ecological values, riparian habitat, recreational values, landscape quality and amenity values of the waterway.

P Peacocke Structure Plan

P3 Development in the Peacocke Precinct

d) The extent to which development contributes a range of housing typologies and densities to create a diverse neighbourhood consistent with the purpose of the Peacocke Precinct.

e) The extent to which development is designed to respond to ecological corridors and habitat, and ensures they protect and maintain the ecological function of these corridors; including the management of lighting and building location

P5 Subdivision in the Peacocke Structure Plan

p) The extent to which the proposal:

1. Restores, protects and enhances aquatic and terrestrial ecological values associated with springs, streams, waterways, wetlands and their margins in Peacocke.

2. Protects or enhances the natural character and ecological, cultural, heritage and amenity values of Peacocke's open spaces.

Figure 2-1: Peacocke Structure Plan – Land use

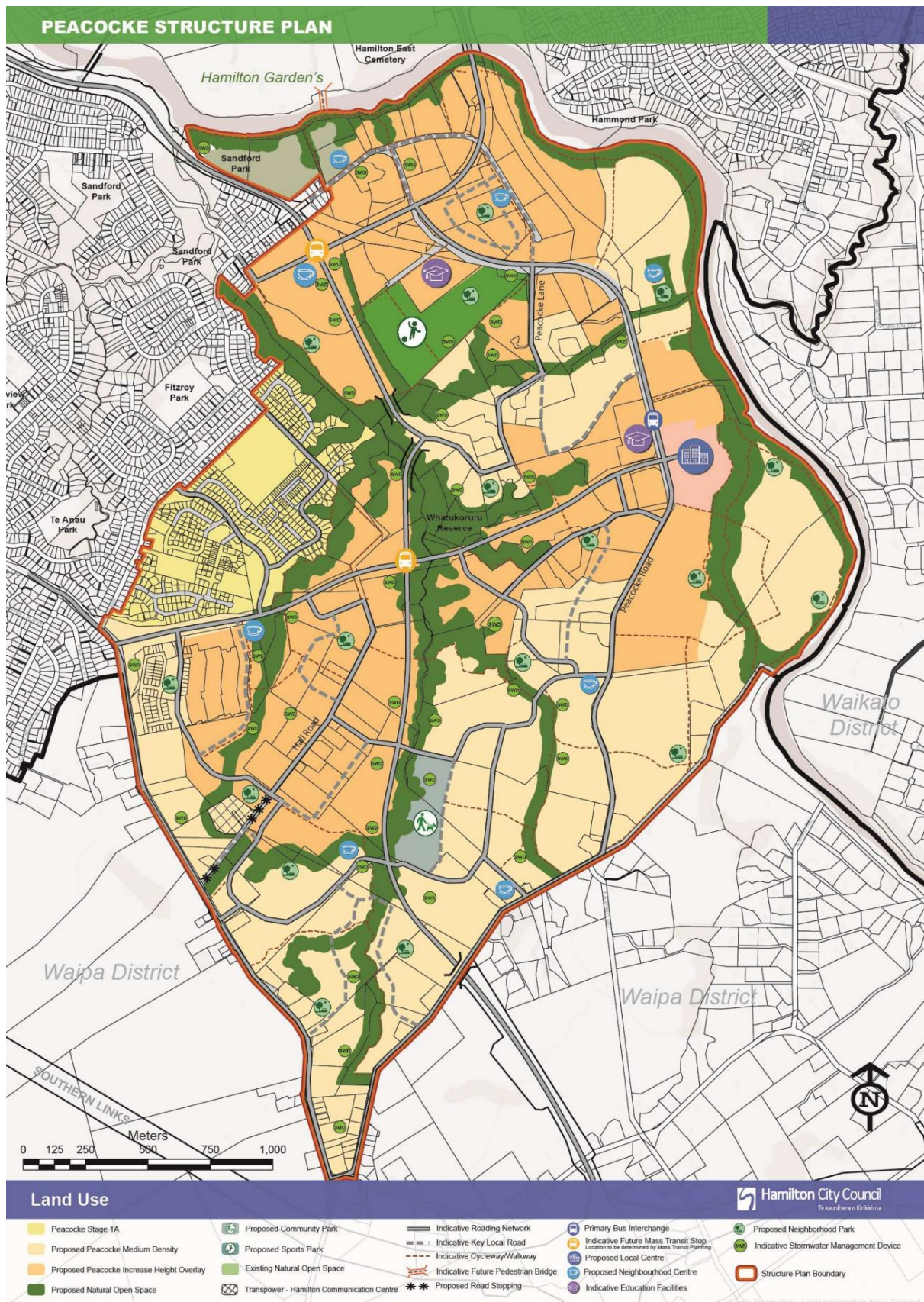


Figure 2-2: Peacocke Structure Plan –Transport Network

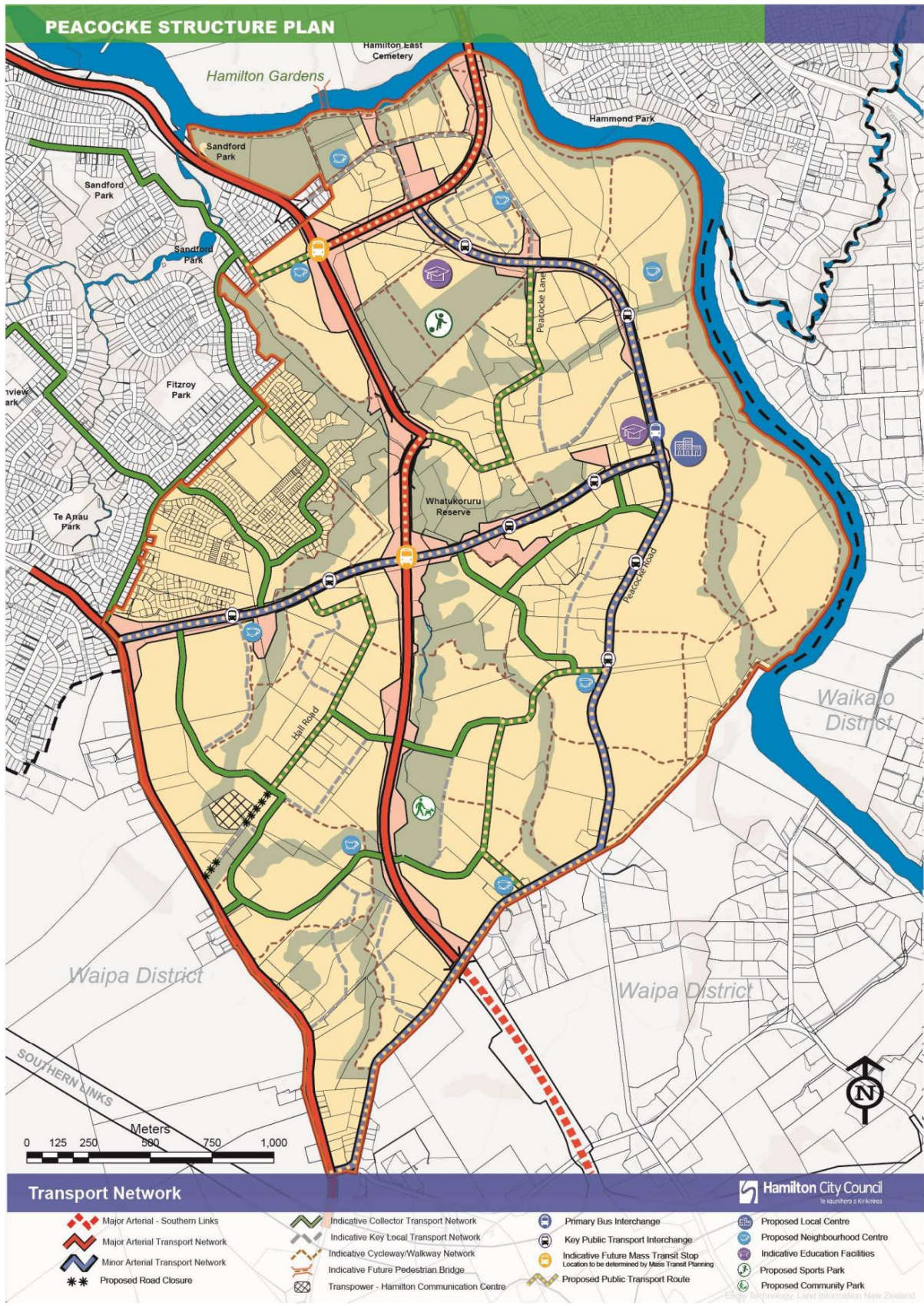
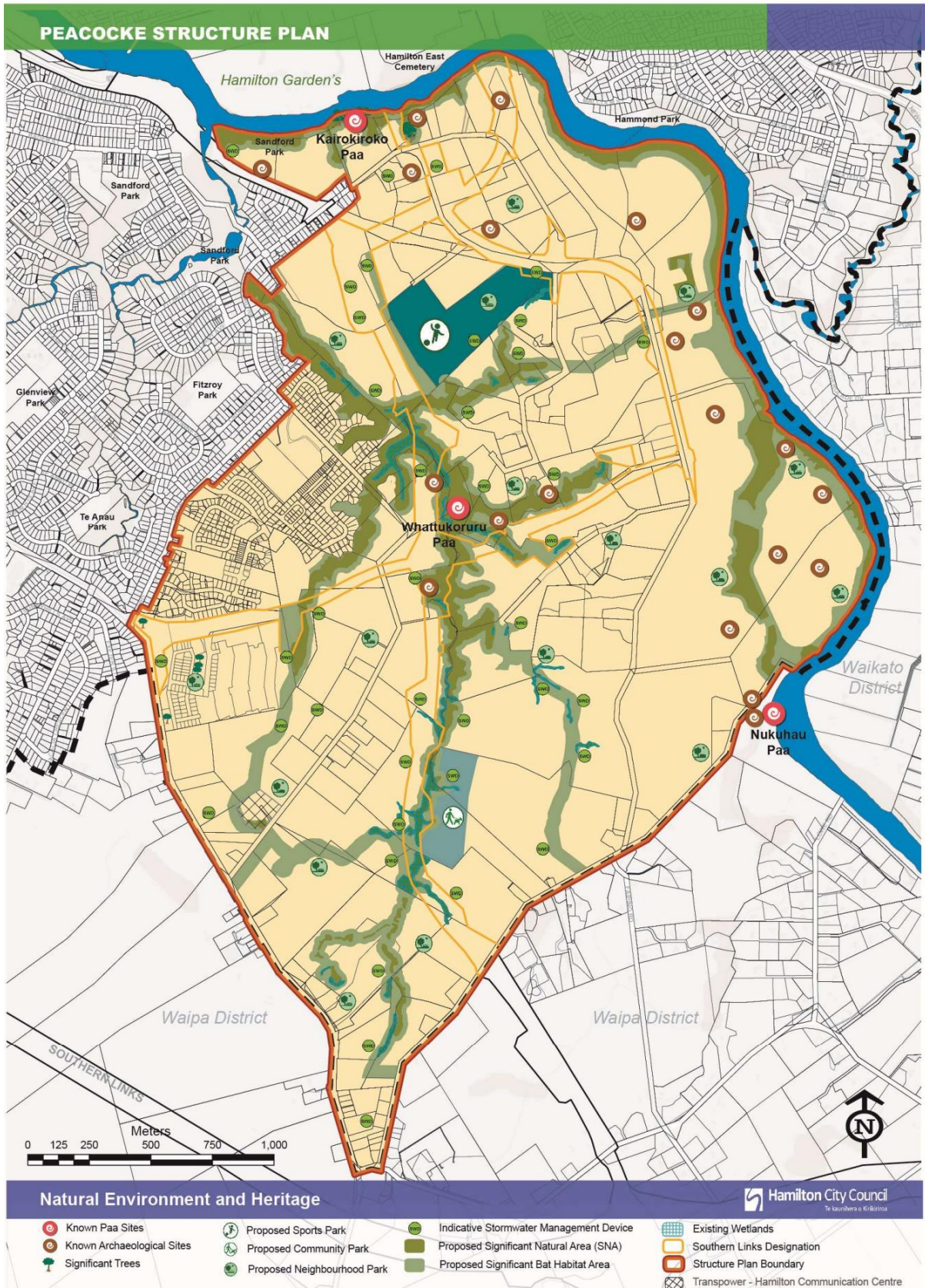


Figure 2-3: Peacocke Structure Plan – Natural Environment and Heritage



Appendix 2: Relevant provisions of the Waikato Regional Policy Statement

Objective 3.12 Built Environment

Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:

- a) promoting positive indigenous biodiversity outcomes;
- c) integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors;

Objective 3.19 Ecological integrity and indigenous biodiversity

The full range of ecosystem types, their extent and the indigenous biodiversity that those ecosystems can support exist in a healthy and functional state.

Method 6.1.8 Information to support new urban development and subdivision

District plan zoning for new urban development (and redevelopment where applicable), and subdivision and consent decisions for urban development, shall be supported by information which identifies, as appropriate to the scale and potential effects of development,

...

- c) multi-modal transport links and connectivity, both within the area of new urban development, and to neighbouring areas and existing transport infrastructure; and how the safe and efficient functioning of existing and planned transport and other regionally significant infrastructure will be protected and enhanced;

...

Policy 6.3 Co-ordinating growth and infrastructure

Management of the built environment ensures:

- a) the nature, timing and sequencing of new development is co-ordinated with the development, funding, implementation and operation of transport and other infrastructure, in order to:
 - i) optimise the efficient and affordable provision of both the development and the infrastructure;
 - ii) maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;
 - iii) protect investment in existing infrastructure; and
 - iv) ensure new development does not occur until provision for appropriate infrastructure necessary to service the development is in place;
- b) the spatial pattern of land use development, as it is likely to develop over at least a 30-year period, is understood sufficiently to inform reviews of the Regional Land Transport Plan. As a

minimum, this will require the development and maintenance of growth strategies where strong population growth is anticipated;

- c) the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained; and
- d) a co-ordinated and integrated approach across regional and district boundaries and between agencies; and
- e) that where new infrastructure is provided by the private sector, it does not compromise the function of existing, or the planned provision of, infrastructure provided by central, regional and local government agencies

6.3.1 Plan provisions

Regional and district plans shall include provisions that provide for a long-term strategic approach to the integration of land use and infrastructure and that give effect to Policy 6.3, including by ensuring as appropriate that:

- a) roading patterns and design support the use of public transport;
- b) walking and cycling facilities are integrated with developments;
- c) the different transport modes are well connected

...

6.3.4 Planning for land use and transport

Local authorities should ensure as appropriate, that growth strategies, structure plans, regional land transport plans and development manuals and design codes are consistent with the directions in Policy 6.3.

Policy 6.15 Density targets for Future Proof area

Hamilton City Council, Waipa District Council and Waikato District Council shall seek to achieve compact urban environments that support existing commercial centres, multi-modal transport options, and allow people to live, work and play within their local area. In doing so, development provisions shall seek to achieve over time the following average gross density targets

6A Development principles

General development principles

New development should:

...

- i) promote compact urban form, design and location to:
 - i) minimise energy and carbon use;
 - ii) minimise the need for private motor vehicle use;
 - iii) maximise opportunities to support and take advantage of public transport in particular by encouraging employment activities in locations that are or can in the future be served efficiently by public transport;

- iv) encourage walking, cycling and multi-modal transport connections; and
- v) maximise opportunities for people to live, work and play within their local area;

...

Policy 11.1 Maintain or enhance indigenous biodiversity

Promote positive indigenous biodiversity outcomes to maintain the full range of ecosystem types and maintain or enhance their spatial extent as necessary to achieve healthy ecological functioning of ecosystems, with a particular focus on:

- a) working towards achieving no net loss of indigenous biodiversity at a regional scale;
- b) the continued functioning of ecological processes;
- c) the re-creation and restoration of habitats and connectivity between habitats;
- d) supporting (buffering and/or linking) ecosystems, habitats and areas identified as significant indigenous vegetation and significant habitats of indigenous fauna;
- e) providing ecosystem services;
- f) the health and wellbeing of the Waikato River and its catchment;
- g) contribution to natural character and amenity values;
- h) tāngata whenua relationships with indigenous biodiversity including their holistic view of ecosystems and the environment;
- i) managing the density, range and viability of indigenous flora and fauna; and
- j) the consideration and application of biodiversity offsets.

Policy 11.2 Protect significant indigenous vegetation and significant habitats of indigenous fauna

Significant indigenous vegetation and the significant habitats of indigenous fauna shall be protected by ensuring the characteristics that contribute to its significance are not adversely affected to the extent that the significance of the vegetation or habitat is reduced.