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16 May 2023

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Attn: Plan Change 15 Submission

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Dear Sir/Madam

Waikato Regional Council Submission to Proposed Private Plan Change 15 – Tuumata to the Operative Hamilton City District Plan

Thank you for the opportunity to make a submission on the Proposed Private Plan Change 15 – Tuumata to the Operative Hamilton City District Plan. Please find attached the Waikato Regional Council's submission, endorsed by the Submissions Subcommittee on 16 May 2023.

Waikato Regional Council looks forward to being involved in further discussions regarding the proposed plan change.

Should you have any queries regarding the content of this document please contact Katrina Andrews, Policy Advisor, Strategic and Spatial Planning directly on (07) 8590 929 or by email Katrina.Andrews@waikatoregion.govt.nz.

Regards,

A handwritten signature in black ink, appearing to read "Tracey May".

Tracey May
Director Science, Policy and Information

Submission from Waikato Regional Council to Proposed Private Plan Change 15 – Tuumata to the Operative Hamilton City District Plan

16 May 2023

Introduction

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to Proposed Private Plan Change 15 – Tuumata (PC15). WRC's primary interest relates to the Waikato Regional Policy Statement (WRPS). District Plans, including plan changes such as this one, are required to give effect to the WRPS (Resource Management Act 1991 s75(3)(c)).
2. In this case, the key areas of interest relate to the WRPS and the Future Proof land use pattern, transport, ecology and biodiversity, and stormwater and land drainage.
3. WRC generally supports the provisions of PC15 however, we have some concerns relating to public transport, long-tailed bats, and land drainage.
4. We provide general comments in relation to the WRPS and Future Proof Strategy, transport, and long-tailed bats below, followed by a table of specific submission points that sets out further details of our submission, covering the broader scope of matters of WRC interest.

WRPS and Future Proof Strategy – General Comments

5. We consider PC15 generally aligns with the relevant provisions of the WRPS, except where otherwise discussed in this submission (predominantly in relation to the Ecosystems and Indigenous Biodiversity chapter).
6. PC15 is consistent with the Future Proof Strategy 2022, which identifies the plan change site as a greenfield growth area to be developed within a 10 year timeframe. The Future Proof Strategy also envisages that the area will be serviced by a neighbourhood centre to meet the day-to-day needs of its residents.
7. As identified in the Plan Change Request, WRC has prepared Proposed Change 1 to the WRPS - National Policy Statement on Urban Development 2020 and Future Proof Strategy Update (WRPS Change 1) to give effect to the National Policy Statement on Urban Development and reflect the latest version of the Future Proof Strategy. WRPS Change 1 was publicly notified on 18 October 2022, and a hearing was held on 8-9 May 2023.
8. As WRPS Change 1 proposes to amend provisions of the Urban Form and Development chapter of the WRPS to reflect the most recent version of the Future Proof Strategy, PC15 is also consistent with the provisions of WRPS Change 1 in terms of the anticipated location and timing of development of the plan change site.

Transport – General Comments

9. PC15 is consistent with the general development principles within Appendix APP11 of the WRPS which seek that new development should:
 - Not compromise the safe, efficient and effective operation and use of existing and planned infrastructure, including transport infrastructure.
 - Connect well with existing and planned development and infrastructure.
 - Promote compact urban form, design and location to:
 - minimise energy and carbon use
 - minimise the need for private motor vehicle use

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

10. PC15 is also consistent with the Waikato Regional Land Transport Plan 2021-2051 and the Waikato Regional Public Transport Plan 2022-2052.

11. The proposed provisions of walking and cycling connections and the connections into the existing cycleway network will support public transport well.

12. It is believed that there is further opportunity to enhance the proposed transport network and options in a manner that will improve transport emissions outcomes and community wellbeing.

13. We consider the plan change should provide for higher density development around public transport nodes on frequent corridors (the Fifth Avenue extension and Eastern Transport Corridor) and seek an amendment to the proposed zoning and plan change provisions to achieve this.

14. Activation of the public transport nodes should also be a key consideration, particularly with the Eastern Transport Corridor stops. These stops have the potential to feel quite isolated and disconnected from the development.

15. There may be some staging issues that require consideration:

- The proposed plan change provisions allow the development of 430 lots before the Fifth Avenue extension is connected through to the Eastern Transport Corridor. Consideration will need to be given to interim public transport services whilst the development is solely accessed via the stub road from Wairere Drive and before services are able to operate on the arterials. There is no 'ideal' bus route to extend into the site and creating a new bus route will come at a significant annual cost.
- Interim short-term public transport routes will likely look different to what the long term, higher frequency services will look like.
- It may be beneficial if staging conditions could be included that require off-site works to be implemented (i.e., a pedestrian connection from the plan change area through to Northolt Road), as this would improve connectivity in long term for people within Fairview Downs to both a frequent public transport service and the proposed Neighbourhood Centre. This would maximise the public transport and walkable catchment area.

Long-tailed Bats – General Comments

16. Long-tailed bats are a Threatened – Nationally Critical species which are present in the Hamilton area. They are a highly mobile species, with varied habitats for roosting, foraging, commuting, and socialising. The Ecological Impact Assessment (EIA), provided as Appendix 6 to the Plan Change Request, identifies that long-tailed bats have been recorded within the plan change site and that the site contains potential bat roost trees.

17. It is recommended that further assessment be undertaken to provide a better understanding of the current use of the site by long-tailed bats and that the provisions for bats and bat habitat be strengthened to meet the direction of the WRPS, particularly Policies ECO-P1, ECO-P2 and ECO-P3 and Methods ECO-M1, ECO-M2 and ECO-M13.

18. Hamilton City Council's (HCC) Environment Committee endorsed the Waikato Regional Bat Strategy in February 2022. This strategy was prepared on behalf of the Waikato Bat Alliance. The Alliance is a

cross-council, multi-organisation group which includes council staff representatives from WRC, HCC, Waipā District Council, Waikato District Council and the Department of Conservation, as well as representatives from Waikato-Tainui, Te Haa o te Whenua o Kirikiriroa and Ngā Iwi Tōpū o Waipā.

19. A key outcome of this operational Strategy is to align plans, policies and methods for bat habitat protection and restoration through high-level strategic collaboration between Alliance members. It is noted that the Bat Strategy is not a statutory document, however staff have identified that district plan changes are identified as opportunities to resolve issues around bat habitat protection.

Table of specific submission points: WRC submission to Proposed Private Plan Change 15

Submission point	Provision	Support/Oppose	Submission	Relief sought
<i>Ecological Impact Assessment</i>				
<i>Black mudfish</i>				
20.	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.
21.	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> <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>	Provide further detail in relation to the BE1 wetland proposed as compensation for the loss of black mudfish habitat.

Submission point	Provision	Support/Oppose	Submission	Relief sought
<i>Long-tailed bats</i>				
22.	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>	<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.</p>
23.	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 qualified/experienced to carry out this survey. • We note that the potential roost trees identified were predominantly very large trees. The EIA identifies <i>Robinia pseudoacacia</i> on the subject site, which is commonly used by bats for roosting. We are not able to understand from the EIA where the <i>Robinia pseudoacacia</i> 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>Clarify who undertook the bat roost survey discussed in the EIA.</p> <p>Provide more information on the specific trees identified as being low, medium, and high risk for bat roosting across the site. Any trees which contain bat roosting features should be classified higher than 'low risk'.</p>

Submission point	Provision	Support/Oppose	Submission	Relief sought
24.	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 immediately to the south of the site; bats may be utilising the connectivity between the two sites at present.</p> <p>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>	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.
25.	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> <p>The WRPS directs district plans to require activities to avoid loss of significant habitat of indigenous fauna in preference to remediation or mitigation (ECO-M13). The EIA does not make recommendations to avoid, remedy or mitigate the proposed loss of bat habitat on the site, and instead recommends</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.

Submission point	Provision	Support/Oppose	Submission	Relief sought
			<p>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>	
26.	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 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 Point 39 below in relation to this.</p>	Add new rules relating to the preparation of a Bat Management Plan for the plan change area – see Point 39 below.

Submission point	Provision	Support/Oppose	Submission	Relief sought
<i>Sub-catchment ICMP and Appendices</i>				
27.	General	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 below.</p>	None
28.	General	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 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 for the 10-year event the overflow peak equates to an average flow draining 38mm over 24 hours.</p>	Provide an assessment of effects in relation to any potential for drainage overflow to the east of the plan change site.

Submission point	Provision	Support/Oppose	Submission	Relief sought
<i>Zoning and Structure Plan</i>				
29.	Structure Plan	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
30.	Structure Plan	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 Point 40 below).	Retain
31.	Structure Plan, zoning, and associated provisions	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>
<i>Plan Change Provisions</i>				
<i>Structure Plans – Ruakura</i>				
32.	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	Retain

Submission point	Provision	Support/Oppose	Submission	Relief sought
			provision for day-to-day community and retail needs of the locality, contributing to the creation of a well-functioning urban environment.	
33.	3.7h. Explanation to Rules	Support with amendment	<p>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.</p> <p>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.</p>	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.
34.	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
35.	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 choices, and giving effect to Te Ture Whaimana o Te Awa o Waikato – The Vision and Strategy for the Waikato River.	Retain
36.	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
37.	3.7.4.3.9a. – Explanation to Rules	Support with amendment	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.	Replace the reference to 'Table 6-2' in 3.7.4.3.9a. with 'Table 35'.

Submission point	Provision	Support/Oppose	Submission	Relief sought
			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.	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.
38.	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
39.	New rules relating to Bat Management Plan	New	<p>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.</p> <p>The BMP should be prepared by a suitably experienced bat ecologist and cover matters including, but not limited to:</p> <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. 	<p>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.</p> <p>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 variation thereof approved by way of a subsequent resource consent.</p>

Submission point	Provision	Support/Oppose	Submission	Relief sought
			<ul style="list-style-type: none"> • 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>	
40.	New rule relating to pedestrian connection to Fairview Downs	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.
<i>Tuumata Residential Precinct</i>				
41.	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
42.	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
43.	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
44.	Rule 4.15.3	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.	Add new clause requiring a minimum permeable surface area of 30% per site.

Submission point	Provision	Support/Oppose	Submission	Relief sought
			We support the inclusion of requirements for urban trees (Clause b), to align with HCC's Plan Change 12.	
<i>Assessment Criteria</i>				
45.	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
46.	N15p.	Support with amendment	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, <u>and long-tailed bats</u>)..."
47.	N15q.	Support	We support this criterion relating to the extent to which subdivision and stormwater management methods give effect to Te Ture Whaimana.	Retain
48.	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
49.	N15v.	Support with amendment	We support this criterion but suggest that a reference could also be added to the Waikato Stormwater Management Guideline 2020 ¹ .	Retain but add reference to the Waikato Stormwater Management Guideline 2020.

¹ <https://waikatoregion.govt.nz/assets/WRC/WRC-2019/TR20-07.pdf>

Further information and hearings

WRC **wishes to be heard** at the hearings for Proposed Private Plan Change 15 – Tuumata 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

Waikato Regional Council

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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.