

Appendix 1 – Feedback received from Stakeholders

From: "Mike Wood" [REDACTED]
Sent: Mon, 1 Aug 2022 09:38:35 +1200
To: "Jo Cook-Munro" [REDACTED]
Subject: External Sender: Waka Kotahi Feedback on Draft Proposed Plan Change 26: Residential Zone Intensification.

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Dear Jo, the Waipa District Council has requested initial feedback from stakeholders on Draft Proposed Change 26: Residential Zone Intensification. To assist the Council, the following comments are provided:

1. Policy 2.3.1.4 – The policy provides too much discretion. The Plan needs to provide sufficient direction on when higher density proposals will be considered. This could be by way of reference to those matters which are determinants of a well-functioning urban environment.
2. Clause 2A.1.8 (s) – Support the identification of the state highway network being identified as a qualifying matter.
3. Support all provisions which manage the impacts on the safe and efficient operation of the state highway network; in particular rule 2A.4.2.22, 2A.4.2.44.
4. Omissions– We appreciate that timeframes have been tight to produce the Draft Plan Change, however, the absence of the planning maps (to determine how the qualifying matters work) has made it difficult to determine the implications of the Plan Change. In addition, reference is made to changes to the Transportation section (see Executive Summary) but we cannot see any changes that have been made. This needs to be clarified because changes to this section are likely to be of interest to Waka Kotahi.

Thank for the opportunity to comment on Draft Proposed Change 26.

Regards
Mike

Mike Wood (he/him) MRP, MNZPI

Principal Planner

Environmental Planning – Transport Services

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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From: "Ceri Hills" [REDACTED]
Sent: Mon, 18 Jul 2022 14:54:18 +1200
To: "Policy Shared" [REDACTED]
Subject: External Sender: Plan Change 26 draft - pre-notification consultation

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Hi Jo and the district plan team

Thanks for sending out the draft plan change Sec 32 Report for a look at the new provisions.

As a vast majority of this is mandated under the MDRS and with the various placeholders in the draft, our main comments would be around the yet to be drafted definitions.

On the back of the National Planning Standards and 2021 WDP plan changes, many definitions have been/will be better defined for clarity. An example of clarity and clear direction for plan users is the setback rule - with the allowance for 600mm eave dispensation within section 2 but no eave dispensation for road boundaries or setbacks within 2A. Maybe the *'building setback'* definition could also address the dispensation provided in section 2?

Other obvious definitions include the new definition of *'yard'* and how *'site'* is defined with the new use of front yard (opposed to road boundary (rb)) for Section 2A.

We look forward to seeing the notification version in August.

Ngā mihi
Ceri

Ceri Hills, Assistant Planner | Gray Matter Ltd



From: "Rebecca Steenstra" <[REDACTED]>
Sent: Thu, 21 Jul 2022 14:23:09 +1200
To: "Policy Shared" [REDACTED]
Cc: "info" [REDACTED]
Subject: External Sender: RE: [#9010 - Planning] Pre-notification Consultation - Proposed Plan Change 26 - Residential Zone Intensification

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Hi Jo,

We have considered the draft document and have the following comments to make:-

- The document heavily relies on qualifying matters. It would be good to understand the implications of these further:-
 - Development next to a railway should not form as part of a qualifying matter, but rather just require an additional setback as the building standards under the building act already require insulation to a high standard. It would be great if the District Plan was specific on this. Is Kiwi Rail approval required as a rule of thumb or can any adverse effects be adequately mitigated without consultation.
 - Geotechnical suitability can be investigated and, in many situations, mitigated to resolve natural hazard matters – and s106 RMA deals with this. Council has good flooding maps now so perhaps this can be clarified.
 - Any sites with archaeological, cultural or heritage notation requires consent. This could be explicit.
 - Perhaps a consent trigger for any sites which adjoin or contain transmission lines or has an entrance to a state highway which requires written approval from those parties? Be explicit.
 - Green space should not be a qualifying matter. Dwellings should be built close to reserves to provide passive surveillance and the interface with the reserve. The public interaction with the reserve is an important part of the community.
- Rule 2A.4.2.2 allows no more than 3 residential units. Under the reform, if you have 4 or more residential units that do not comply with the standards then a land use or subdivision consent cannot be limited or publicly notified (clause 5). The interaction with the infill housing rules is not well understood by us. Why would you need that rule? Why do you need minimum lot areas? The infill housing rules need to be deleted and the MDRS need to apply no matter the number of lots and dwellings that end up on a site. There should not be a maximum of 6 – it should continue on to as many as the site accommodates. The site coverage will ultimately control the number of dwellings on a title. So will the underlying area of the title (Cambridge and TA only have a handful of sites of 1000m2 left), and the market demand for a certain sized section and dwelling.
- The compact housing rules also need to be deleted in favour of rules for high density – such as apartment buildings for example. Council needs to consider where high density is appropriate, and a higher percentage site coverage, near to the town centre or reserve areas should be

encouraged. Perhaps the compact housing areas now become high density zones. A higher site coverage is permitted and three stories.

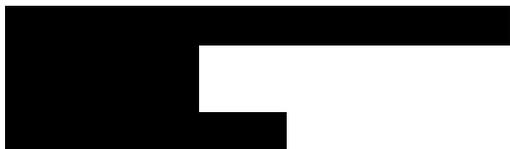
- A 4m setback to buildings from a reserve is too large and should be reduced to 1m.
- A 10m setback from SNA should continue to apply. Are there many SNA in residential areas?
- It would be good to understand the 'overlays' – those sites that adjoin the river we agree should have careful management of stormwater. This does not mean that site coverage should be reduced, but rather the total impermeable area within a site if the stormwater drains to the river.
- Rule 2A.4.2.11(a) – Why is there a maximum impermeable area for Cambridge North that is less than elsewhere – is it because of the pond on Victoria Road? The minimum of a 45% permeable area will mean that once you have a 50% site coverage you are left with 5% impermeable on your site. Almost every site will need a land use consent. What is the solution for Cambridge North? Will it be a prohibited activity to exceed 55% impermeable area, or will the pond be made bigger, or will every site have to attenuate to the 100-year rate?
- The character street setbacks are not necessary. A lot of the noted character streets no longer have character within the private property and should be revisited (e.g Bryce St). We argue that the character is within the road corridor itself where the large trees, footpaths, large grass berms, and wide roads create the character. Private property and the setbacks do not create the character. There is also no protection on any of the dwellings (apart from character clusters) requiring them to be retained. Therefore, the dwellings can be replaced with new dwellings. The setback of 6m does not create character within the streets – and certainly does not warrant a setback which is 4 times the usual setback. This should be reconsidered.
- Setback references – would be good to be internal and road to remain consistent with other references.
- We agree with Kihikihi being brought in as a part of Te Awamutu, as there is a significant amount of land there that can be developed as medium density with large lot areas available.
- Notification requirements should be explicit within the rules of the plan.
- How are the access width rules covered? Many rear sites will not comply with the minimum width standards when subdivided. I.e when you are creating more than 3 lots and the access is 4m or less, how will development be dealt with?

Please let me know if you require any further clarification on these matters/points raised. We are more than happy to discuss this with you.

Kind Regards,
Rebecca Steenstra
Planning Manager



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From: Policy Shared [REDACTED]
Sent: Wednesday, 13 July 2022 1:23 pm
Subject: Pre-notification Consultation - Proposed Plan Change 26 - Residential Zone Intensification

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Tēnā koe

Waipā District Council is proposing a change to the Waipā District Plan and is seeking your feedback on the [draft plan change 26 and s32 report](#) in accordance with the Resource Management Act 1991.

Please note that the draft plan change documents are incomplete. Due to the tight timeframes set down by central government, we will continue to draft the plan change and section 32 reports up to the date it goes to Council's Strategic Planning and Policy Committee in early August 2022 to be approved for notification.

We would welcome your feedback on this proposed plan change by **Friday, 5 August 2022** to enable public notification by 20 August 2022. Once the plan change has been notified, you will have the opportunity to provide a submission on the plan change as a whole.

Please reach out to Jo-Anne Cook-Munro with any questions or queries: districtplan@waipadc.govt.nz or phone 0800 WAIPADC (0800 924 723).

Ngā mihi nui
Waipā District Council

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From: "Susan Henderson" [REDACTED]
Sent: Thu, 28 Jul 2022 11:11:28 +1200
To: "Jo Cook-Munro" [REDACTED]
Cc: "Robert Brodnax" [REDACTED]
[REDACTED]
Subject: External Sender: Future Proof - informal feedback on Plan Change 26

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Thank you for the opportunity to provide feedback on an early draft of Plan Change 26 to the Waipa District Plan.

This feedback constitutes informal feedback from the Future Proof Implementation Advisor. Given the timeframes involved, there has not been an opportunity for the wider Future Proof partnership to provide input. The following does not constitute an official Future Proof position and so is provided on a without-prejudice basis. We also understand and appreciate that due to timeframes the draft is incomplete and does not include maps or some of the evidence base that will be relied upon so it's not possible to provide a definitive position at this time.

Key feedback points are:

- The increased prominence of Te Ture Whaimana throughout the document aligns with Future Proof, as does the inclusion of the implementation of Te Ture Whaimana as a cross-boundary issue.
- The draft sets out the matters which will apply as qualifying matters. Future Proof is interested in understanding the extent of the qualifying matters via mapping where applicable, and the technical evidence being prepared. If the application of qualifying matters will likely result in reduced housing supply and housing choice, this would need to be supported by robust evidence.
- The s32 appears to quote and apply the superseded Policy 3 from the NPS-UD. It is noted that the new Policy 3 (as amended by the Housing Amendment Act) requires consideration of neighbourhood centres, local centre zones and town centre zones (Policy 3 (d)) and whether the zoning in the vicinity is appropriate. This would apply to Cambridge, Te Awamutu and Kihikihi based on the townships being included in the Plan Change.
- In order to create a well-functioning urban environment, consideration should be given to all aspects of urban development, including transportation. Council may wish to consider whether any changes are necessary to other sections of the District Plan to ensure a well-functioning urban environment as the towns intensify. This may be as simple as requiring bicycle storage etc. This may already be in development but not ready at the time of drafting.
- Consideration should be given to any climate change objectives or policies that could be relevant to the District.

- Council should ensure all Future Proof partners are listed in the Strategic Policy Framework.
- It is noted that there were a few instances of inconsistent uses of macrons in the draft. However it is assumed that this will be amended through the final proof-read.

Sent on behalf of Robert Brodnax, Future Proof Implementation Advisor



Susan Henderson BSocSc (Hons), PGDipREP, MNZPI

Principal Consultant | GMD Consultants



From: [REDACTED]

Sent: Tuesday, 2 August 2022 2:29 pm

To: Policy Shared [REDACTED]

Cc: [REDACTED]

Subject: External Sender: RE: Iwi Statutory Consultation – Proposed Plan Change 26 - Residential Zone Intensification

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Kia ora Jo-Anne

Thank you for the invitation to Te Kōpua Marae to comment on the Residential Zone Intensification before the public submissions on 20th August

As the plan is still being drafted, we have no comment on the proposed changes. Instead, we will review and, if necessary, engage in the public submission process.

Nāku iti, nā

Dominic Viles (Tūmoana)

Ngāti Unu & Ngāti Kahu representative | Te Kōpua Marae | Ngā Iwi Tōpū o Waipā

From: Policy Shared [REDACTED]

Sent: Wednesday, 13 July 2022 10:17 am

Subject: Iwi Statutory Consultation – Proposed Plan Change 26 - Residential Zone Intensification

Tēnā koe

Waipā District Council is proposing a change to the Waipā District Plan and is seeking your feedback on the [draft plan change 26 and s32 report](#) in accordance with Schedule 1, Clause 4A of the Resource Management Act 1991.

Please note that the draft plan change documents are incomplete. Due to the tight timeframes set down by central government, we will continue to draft the plan change and section 32 reports up to the date it goes to Council’s Strategic Planning and Policy Committee in early August 2022 to be approved for notification.

We would welcome your feedback on this proposed plan change by **Friday, 5 August 2022** to enable public notification by 20 August 2022. Once the Plan Change has been notified, you will have the opportunity to provide a submission on the plan change as a whole.

Please reach out to Jo-Anne Cook-Munro with any questions or queries:
districtplan@waipadc.govt.nz or phone 0800 WAIPADC (0800 924 723).

Ngā mihi nui
Waipā District Council

From: Pauline Whitney [REDACTED]
Sent: Wednesday, 3 August 2022 12:56 pm
To: Policy Shared [REDACTED]
Subject: External Sender: FW: Pre-notification Consultation – Proposed Plan Change 26 - Residential Zone Intensification, Comments from Transpower NZ Ltd

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Kia ora

In response to the email below regarding feedback on draft plan change 26, please find attached comments from Transpower New Zealand Ltd.

Please do not hesitate to contact me should you have any queries on the attached or would like to discuss any aspect of Trans power's comments.

Regards

Pauline

Pauline Whitney
Senior Environmental Planner
Environmental Policy and Planning Team

[REDACTED]

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From: Policy Shared [REDACTED]
Sent: Wednesday, 13 July 2022 10:29 AM
Subject: Pre-notification Consultation – Proposed Plan Change 26 - Residential Zone Intensification

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Waipā District Council is proposing a change to the Waipā District Plan and is seeking your feedback on the [draft plan change 26 and s32 report](#) in accordance with the Resource Management Act 1991.

Please note that the draft plan change documents are incomplete. Due to the tight timeframes set down by central government, we will continue to draft the plan change and section 32 reports up to the date it goes to Council's Strategic Planning and Policy Committee in early August 2022 to be approved for notification.

We would welcome your feedback on this proposed plan change by **Thursday, 5 August 2022** to enable public notification by 20 August 2022. Once the Plan Change has been notified, you will have the opportunity to provide a submission on the plan change as a whole.

Please reach out to Jo-Anne Cook-Munro with any questions or queries:
districtplan@waipadc.govt.nz or phone 0800 WAIPADC (0800 924 723).

Ngā mihi nui
Waipā District Council



3 August 2022

Waipa District Council
Private Bag 2402
Te Awamutu 3840

Via Email: districtplan@waipadc.govt.nz

Dear Sir/Madam,

Feedback by Transpower NZ Ltd on the Draft Proposed Plan Change 26: Residential Zone Intensification

The following relates to the feedback sought by Council on the upcoming plan change to the District Plan relating to housing intensification, to give effect to the National Policy Statement on Urban Development 2020, and the Resource Management (Enabling Housing Supply and other Matters) Amendment Act 2021 (“the RMA-EHS”).

Transpower New Zealand Limited (“Transpower”), the owner and operator of New Zealand’s national electricity transmission network (“the National Grid”) appreciates the opportunity to provide feedback on the draft proposed plan change.

The purpose of this letter is to provide feedback on:

- Recognition of the National Grid as a qualifying matter, and
- Provide specific comments on the draft plan change provisions on which feedback has been invited.

National Grid provisions as a Qualifying Matter

The current Residential Zone chapter in the Operative Plan includes an objective (2.3.7) relating to National Grid transmission networks, and a series of policies directing how activities within National Grid corridors are to be managed (Policies 2.3.7.1 – 2.3.7.5). The Plan includes land use and subdivision rules that regulate activities within a corridor around National Grid transmission lines and National Grid support structures. These provisions are detailed below:

National Grid Yard

Under Rule 2.4.1.5(j), it is a non-complying activity for any building or building addition for a National Grid Sensitive Activity within the National Grid Yard, or for the establishment of a new, or change of use to, a National Grid Sensitive Activity. The definition of a ‘National Grid Sensitive Activity’ includes residential activities. Under 2.4.2.38, buildings – which would include new residential units - must also be setback 12m from a National Grid Support Structure; failure to achieve this is also a non-complying activity under Rule 2.4.1.5(j). The National Grid Yard is, by definition the area located:

- 12 metres in any direction from the outer edge of a National Grid support structure;

- 10 metres either side of the centreline of an overhead 110 kV National Grid line on single poles; and
- 12 metres either side of the centreline of any overhead National Grid line on pi poles or towers.

Subdivision

Under Rule 15.4.2.29, it is a requirement for all lots to identify a building platform for the principal dwelling, and any proposed secondary dwelling, outside of the National Grid Yard. Non-compliance with this standard results in a non-complying activity status. Where this standard is complied with, consent is required as a restricted discretionary activity, with matters of discretion including consideration of effects on the National Grid electricity transmission network.¹

For the purpose of this letter, where referred to as a collective set of provisions including the National Grid Yard rules and subdivision rules, we refer to this as the “National Grid corridors”.

National Grid provisions as a Qualifying Matter

The National Grid corridor provisions are existing qualifying matters in terms of section 77K(3) of the RMA, as they:

- are a matter required to give effect to the National Policy Statement on Electricity Transmission 2008 (the “NPSET”), being a national policy statement (other than the NPSUD)²; and
- are a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure³; and
- are currently operative, and so will be operative in the relevant district plan when the IPI is notified.

There is no ambiguity as to whether National Grid corridors are qualifying matters. See, for example, the Report of the Environment Committee on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill dated December 2021, which noted at page 15: *“the qualifying matters set out in new section 77[1] include a matter of national importance and a matter required to ensure that nationally significant infrastructure operates safely or efficiently, and avoid reverse sensitivity concerns. This could include ensuring residential housing is safely set back from high voltage transmission lines, and other infrastructure such as airport noise areas, in order to avoid reverse sensitivity concerns”*.

Transpower considers it is not an efficient use of resources for the operative provisions to be relitigated as part of Council’s incorporation of the Medium Density Residential Standards. As an existing qualifying matter, the National Grid corridors within affected residential zones should be included and notified in Council’s Intensification Planning Instrument (IPI) without change. Transpower therefore supports the intent within the proposed Plan Change to do so. Noting that the

¹ Including Rule 15.4.1.1(e) for subdivision that meets all the performance rules in Part A OR; Part A and Part C for 7 or more lots; Rule Rule 15.4.1.1(k) Subdivision in any area of High Value Amenity, Significant or Other Landscapes or within a Significant Natural Area; and Rule 15.4.1.1(k) for subdivision of existing dwellings, constructed prior to 31 May 2012 in the Residential Zone.

² Resource Management Act 1991, s 77I(b).

³ Resource Management Act 1991, s 77I(e).

draft s32 assessment is not yet complete, supporting information is attached as Appendix A to assist with the assessment for the incorporation of the National Grid corridor as a qualifying matter in the IPI, as required by Section 77K of the RMA-EHS.

Feedback on draft Plan Change

Transpower understands the change will amend the framework (Section 2) applying to the existing Residential Zone so that it no longer applies to Cambridge, Kihikihi and Te Awamutu and will introduce a new chapter (Section 2A) applying to areas in Cambridge, Kihikihi and Te Awamutu that are to be zoned Medium Density Residential Zone. This is of relevance to Transpower as there are existing National Grid assets in both the remaining Residential Zone and the proposed Medium Density Residential Zone.

Transpower's primary concern is to ensure the National Grid is recognised as a qualifying matter and appropriate provisions are included within the plan change. As such, Transpower supports the following aspects of the draft Plan Change:

- Inclusion of new Policy 1.3.2.2 "XX", which seeks to provide for medium density residential development in relevant residential zones located within the urban environs of Cambridge and Te Awamutu, and explicitly states that a 'relevant residential zone' is one where a qualifying matter does not apply. Transpower agrees with this being made clear at the policy level to avoid any tension between the outcomes sought for the Medium Density Residential Zone as a whole, and those sought for areas which are subject to a qualifying matter.
- Inclusion in the Introduction Section of where qualifying matters have been applied, including specific reference to National Grid transmission lines in 2A.1.24 – 2A.1.29. Transpower seek minor changes to the wording of this section to improve clarity. These are set out in Appendix B with changes shown in red text.
- Inclusion within the new Section 2A of the objectives and policies relating to the National Grid. This ensures that the policy framework currently applying within National Grid corridors continues to apply within the Medium Density Residential Zone and helps support the application of the National Grid corridors as a qualifying matter.

It is noted that no changes to the subdivision provisions have been included within the draft Plan Change document. Transpower seeks the operative National Grid subdivision provisions be included as a qualifying matter, with a restricted discretionary activity status for subdivision within the National Grid Corridor, where a building platform outside of the National Grid Yard is identified for the principal dwelling, and any proposed secondary dwelling, and allowing for consideration of effects on the National Grid electricity transmission network; and a non-complying activity status retained where a building platform outside the National Grid Yard is not identified. Transpower notes that currently the restricted discretionary activity status, and consideration of effects on the National Grid currently applies to all subdivision, regardless of its location. Transpower considers that it may be more appropriate to amend the rule package so that a restricted discretionary activity status is applied to subdivision within the Medium Density Residential Zone, that is within the National Grid Corridor (as defined). That way, the qualifying matter applied to subdivisions will be limited to areas within the National Grid Corridor.

It is also noted that any changes to definitions have not been included within the draft proposed Plan Change. Transpower seeks to ensure that the existing definitions for 'National Grid Yard' and 'National Grid Corridor' are not altered.

Transpower also note that it is proposed to make a slight change to Policy 2.3.7.5 (applying to the remaining Residential Zone), and to Policy 2A.3.9.2 (a transfer of the policy which would apply to the proposed Medium Density Residential Zone) as follows:

To not ~~exclude~~ foreclose operation or maintenance options or, to the extent practicable, the carrying out of routine and planned upgrade works.

Transpower queries the necessity of this change and considers that is unclear how the change arises as a consequence of the RMA-EHS. In the event that the wording is changed, Transpower considers that the word “compromise” would be more appropriate than “exclude”, as this is consistent with the wording used in the NPSET.

Feedback on draft s32 Report

Transpower notes that the draft s32 report (at 3.4.6) refers to the NPSET and quotes Policies 10 and 11. Transpower supports this. Transpower also agrees with the conclusion that the proposed Plan Change is, as currently drafted, and noting the matters outlined earlier, consistent with the objectives and policies of NPSET. However, this is on the basis of the National Grid corridor provisions having been identified as a qualifying matter, and Transpower seeks this section of the s32 report to note that explicitly.

As noted earlier, Appendix A to this letter also provides supporting information that may assist the Council’s s32 assessment, as required by Section 77K of the RMA-EHS, with respect to the incorporation of the National Grid corridor as a qualifying matter in the IPI.

Transpower appreciates the opportunity to be involved in the plan change and is happy to clarify any of the comments pertinent to intensification, or comment on any specific provisions of relevance to the National Grid.

If you have any further queries, please do not hesitate to contact me on

[REDACTED]

Yours faithfully

Pauline Whitney

Senior Environmental Planner



Transpower NZ Ltd

[REDACTED]

[REDACTED]

APPENDIX A – Section 77K(1) Evaluation – Process for Existing Qualifying Matters

Section 77K(1)(a) - Identify by location (for example, by mapping) where an existing qualifying matter applies

The National Grid transmission lines are clearly identified on the Operative Plan planning maps⁴. When read together with the rules for National Grid corridors, the Operative Plan maps identify, by location, where the qualifying matter will apply.

Section 77K(1)(b) - Specify the alternative density standards proposed for those areas where an existing qualifying matter applies

Density in the National Grid Yard

In the National Grid Yard, Transpower does not propose any alternative height or density standards. Development within the National Grid Yard is not appropriate for safety, operational and security reasons and should be excluded, meaning that residential density (and by default height) should be zero.

Density in the National Grid Corridor (relating to subdivision)

Transpower does not consider it appropriate to specify within the IPI alternative density (or height) standards in the National Grid (subdivision) Corridor. In this Corridor, a case-by case assessment (by way of a subdivision consent process) is essential in order to ensure that any consequential development can be carried out safely and without compromising the assets, or access to the National Grid. Transpower seeks the operative National Grid Corridor provisions be included as a qualifying matter, with a restricted discretionary activity status where a building platform is identified outside of the National Grid Yard, defaulting to non-complying where this is not met. This means that in some areas of the National Grid Corridor the MDRS will be appropriate and can be fully enabled (that is, there will be no impact on density at all), but in other areas limits on density will be necessary.

Section 77K(1)(c) - Identify why the qualifying matter applies to the identified areas

The National Grid corridors are a qualifying matter in terms of s77K(3) of the RMA as they:

- are a matter required to give effect to the NPSET being a national policy statement (other than the NPS-UD)⁵; and
- are a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure⁶; and
- are currently operative, and so will be operative in the relevant district plan when the IPI is notified.

Giving effect to the NPSET

The NPSET confirms the national significance of the National Grid and addresses its effects. Importantly, it also addresses effects *on* the National Grid – including the activities of others (for example residential development) and requires, through Policy 10, that these do not compromise the operation, maintenance, upgrading and development of the National Grid.

⁴ This includes identification of “HV Electricity Structure”, “HV Electricity Transmission Line” and “HV Electricity Transmission Line (Underground)”.

⁵ Resource Management Act 1991, s 77I(b).

⁶ Resource Management Act 1991, s 77I(e).

The NPSET mandates a corridor for this protection. Specifically, Policy 11 of the NPSET requires that local authorities consult Transpower to identify an appropriate buffer corridor within which sensitive activities (such as residential development) will generally not be provided for in plans and/or given resource consent. This outcome is appropriate and was tested through a comprehensive section 32 analysis undertaken by the Ministry for the Environment (when the NPSET was developed) and a Board of Inquiry hearing, and then subsequently through the section 32 assessment to include the National Grid corridors in the Operative Plan.

Ensuring the safe or efficient operation of nationally significant infrastructure

Development under and near high voltage transmission lines presents risks to the safe and efficient operation of the National Grid and needs to be managed carefully. It is critical that any development near the National Grid occurs in an appropriate and safe way. Transpower seeks to ensure that risks such as electrical shocks are minimised to the greatest extent possible, access for vital maintenance and upgrade work is not constrained, and reverse sensitivity and direct effects are managed, so that its nationally significant infrastructure can continue to operate in the long-term, keeping the lights on across New Zealand.

Transpower is not opposed to residential development and understands the intent of the recent reforms to address issues with New Zealand's housing supply and affordability. Transpower is working with developers and individuals across New Zealand on a daily basis in an effort to accommodate and support new development in a manner which takes the National Grid assets fully into account. If new land uses are properly designed and managed, effects on the safe and efficient operation of the National Grid can be reasonably managed.

Transpower prefers, wherever possible, to manage such risks and effects proactively. Proactive management through appropriate planning rules such as buffer corridors or setbacks is the most effective way of ensuring development occurs in a manner that is compatible with the National Grid, and is consistent with the policy direction in the NPSET and the resulting buffer corridor approach within district plans throughout New Zealand.

While assisting Councils to give effect to the NPSET, the National Grid corridors protect the safe and efficient operation of the National Grid by:

- ensuring that sensitive activities such as residential development will generally not be provided for in close proximity to the lines;
- partially minimising the risk of inadvertent contact with the lines including the risk of flashovers (where an electrical discharge 'jumps' the air gap between an object and the line);
- helping to reduce nuisance impacts on landowners and subsequent complaints about the lines;
- partially protecting the lines from activities and development that could have direct or indirect effects on them;
- partially protecting access to the National Grid by ensuring development activities cannot occur close to the National Grid and prevent Transpower's access to it; and
- partially enabling efficient and safe operation, maintenance, upgrade and development of the lines.

Despite the NPSET being gazetted over 12 years ago, and compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) being mandatory, underbuild and inappropriate and unsafe development continues to occur under and around National Grid assets.

Section 77K(1)(d) - Describe the level of development that would be prevented by accommodating the qualifying matter, in comparison with the level of development that would have been permitted by the MDRS and policy 3

Development in the National Grid Yard

The Operative District Plan⁷ provides that National Grid Sensitive Activities are a non-complying activity within the National Grid Yard in the Residential Zone. This means that the level of development that would be prevented by the qualifying matter is likely to be all development.

While resource consent can technically be applied for, an applicant is unlikely to meet the threshold test in section 104D of the RMA. Residential density will in practice be zero (that is, development would be completely excluded). As explained above, this restriction on development in the National Grid Yard is justified by reference to Policy 11 of the NPSET which requires that local authorities consult Transpower to identify an appropriate buffer corridor within which sensitive activities (such as residential development) will generally not be provided for in plans and/or given resource consent.

Development in the National Grid Subdivision Corridor

Subdivision has the potential to significantly impact the National Grid. This is because subdivision provides the framework for future land use, and if poorly configured, can prevent access to the National Grid for maintenance and result in new allotments that cannot be safely built on.

As a result, all subdivision within the National Grid Corridor requires resource consent in the Operative Plan (as a restricted discretionary activity under Rule 15.4.1.1(e) if a building platform for the principal dwelling, and any proposed secondary dwelling, is identified outside the National Grid Yard, and defaulting to non-complying under Rule 15.4.2.29 where this is not complied with). This Corridor and the associated provisions enable Transpower to be recognised as an affected party that needs to be notified of, and consulted with on, any application. Once part of the consenting process, Transpower is then able to provide specialist technical and engineering input relating to the safe location of housing, including construction methodology. Transpower has a team dedicated to this task, along with an online enquiry portal (called Pātai).

The level of development that may be prevented by the National Grid Corridor (as a qualifying matter) is therefore difficult to assess in the abstract – a case by case assessment is required to determine whether proposed development can be carried out safely and sufficient access to structures enabled. As explained above, in some areas of the National Grid Corridor the MDRS will be appropriate and can be fully enabled (that is, there will be no impact on density at all), but in other area limits on density will be necessary.

⁷ Rule 2.4.1.5(j)

APPENDIX B – Changes Sought (shown as red text)

Qualifying Matters – Nationally Significant Infrastructure

- 2A.1.24 Provisions in the Waipā Operative District Plan related to building in relation to the National Grid transmission network, the state highway roading network and the North Island Main Trunk railway are an existing qualifying matter in terms of section 77K of the Resource Management Act 1991. These provisions are qualifying matters by virtue of section 77(l)(b) of the Act being a matter required to give effect to a National Policy Statement and/or section 77(l)(e) being a matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure.
- 2A.1.25 ~~Specific to the National Grid, t~~The relevant national policy statement is the National Policy Statement for Electricity Transmission 2008. It sets out the objective and policies to enable the management of the effects of the electricity transmission network under the Resource Management Act 1991.
- 2A.1.26 It is recognised that the efficient transmission of electricity on the ~~n~~National ~~g~~Grid plays a vital role in the wellbeing of New Zealand, its people and the environment. Electricity transmission has special characteristics that create challenges for its management under the Act.
- 2A.1.27 A number of ~~Several~~ National Grid transmission lines traverse the ~~Residential Zone of~~ Waipā District. The subdivision, use and development of land is controlled within a defined National Grid Corridor to ensure potential adverse effects are appropriately addressed. The greatest level of restriction on landowners is within the National Grid Yard (particularly the support structures) which is the area that is closest to the transmission line and where there is the greatest potential for adverse effects to occur. The restrictions recognise that the greatest potential effects are generated by sensitive activities and intensive development. For this reason, the National Grid has been identified as a qualifying matters to the Medium Density Residential Standards. Notwithstanding such restrictions, any lawfully established activities within the National Grid Corridor can continue as long as they meet the criteria for existing use rights in the Resource Management Act 1991 or are a permitted activity.
- 2A.1.29 National Grid transmission lines for the transmission of electricity are considered to be a resource of national and regional significance that require protection. The location of activities within National Grid Corridors have the potential to ~~compromise the National Grid and~~ result in adverse effects, including reverse sensitivity effects, on the operation, maintenance, upgrading and future development of the National Grid network and result in sensitive activities locating where they are most vulnerable to the effects, including risks, associated with the line.



**FEEDBACK TO
WAIPAA DISTRICT COUNCIL ON
PROPOSED PLAN CHANGE 26 – RESIDENTIAL ZONE
INTENSIFICATION – SCHEDULE 1 CLAUSE 4A, RESOURCE
MANAGEMENT ACT 1991**

5 AUGUST 2022

This submission is filed for Waikato-Tainui by:

Te Whakakitenga o Waikato Incorporated



INTRODUCTION

- a) Te Whakakitenga o Waikato Incorporated (Waikato-Tainui) provides this feedback on behalf of the Waikato-Tainui iwi and its various entities that represent and work for our iwi.
- b) This feedback is provided under Clause 4A of Schedule 1 of the Resource Management Act 1991.
- c) Waikato-Tainui reserve the right to make a submission following public notification of Proposed Plan Change 26 – Residential Zone Intensification
- d) The documents provided to Waikato-Tainui via email on Wednesday 13 July 2022, are incomplete as Waipaa District Council are awaiting several technical documents to complete the plan change. Therefore, feedback on PC26 is limited.

Te Ture Whaimana o Te Awa o Waikato – The Vision and Strategy for the Waikato River

Te Ture Whaimana is intended to be the primary direction setting document for the Waikato River and activities within its catchment affecting the Waikato and Waipaa Rivers. Te Ture Whaimana prevails over any inconsistencies in other policies, plans, or processes affecting the Waikato River. Relevant policies, plans, and processes cannot be amended so that they are inconsistent with Te Ture Whaimana and must be reviewed and amended, if required, to address any inconsistencies.

Housing intensification, inappropriate subdivisions, use or development of resources has the potential to adversely affect the Waikato River and therefore, fails to give effect to Te Ture Whaimana. Section 771 of the Enabling Housing Supply Amendment Act outlines that a specified territorial authority may make MDRS and the relevant building height or density requirements under policy 3 less enabling of development in relation to an area with a relevant zone only to the extent necessary to accommodate a matter required to give effect to Te Ture Whaimana o Te Awa o Waikato.

The most important factor in PC26 for Waikato-Tainui is ensuring that Te Ture Whaimana is upheld and the objectives are achieved. This means that any development in relation to PC26 must ensure that the enabled residential densities coupled with the capacity of existing and upgraded infrastructure does not lead to significant adverse effects on the River, impacting the health and wellbeing of the Waikato River. Managing land use to match infrastructure capacity to ensure the protection of the health and wellbeing of the Waikato River falls within the role and function of Waipaa District Council.

Proposed Plan Change 26 – Residential Zone Intensification

Waikato-Tainui understand that this plan change is incomplete as the technical documents required to understand how Te Ture Whaimana will be given effect to and applied as a qualifying matter, are not available. The relevant and required technical documents consequently were not part of the package received via email as part of Schedule 1 Clause 4A requirements under the Resource Management Act.

The draft provisions state at 2A1.1.10 *“In order to ensure development in the District does not undermine Te Ture Whaimana – the Vision and Strategy, mapping has been undertaken to identify known capacity constraints in the District’s water supply, wastewater discharge and stormwater discharge networks which are not identified as being upgraded in the foreseeable future. Enabling development to the extent provided for by the Medium Density Residential Standards without further investigation and control over design would result in potential overflows or exceedances beyond the capacity of the public network and adverse downstream effects. Accordingly, land identified as having known capacity constraints are considered to have a qualifying matter applying to it.”* Waikato-Tainui support this approach. However, the mapping is unavailable therefore the extent of infrastructure constraints across the district is not understood making it difficult to determine the implications. It is also not clear what the policy framework pathway will be for those areas which have been identified as having infrastructure constraints if Medium Density Residential Development were to occur. Ultimately it is not clear how the District Plan will apply Te Ture Whaimana and address areas that have been identified as not being able to achieve the objectives.

It is important to note that Schedule 1 Clause 4A in the Resource Management Act states:

4A Further pre-notification requirements concerning iwi authorities

1. *Before notifying a proposed policy statement or plan, a local authority must—*
 - a. *provide a copy of the relevant draft proposed policy statement or plan to the iwi authorities consulted under clause 3(1)(d); and*
 - b. *have particular regard to any advice received on a draft proposed policy statement or plan from those iwi authorities.*
2. *When a local authority provides a copy of the relevant draft proposed policy statement or plan in accordance with subclause (1), it must allow adequate time and opportunity for the iwi authorities to consider the draft and provide advice on it.*

However, as the relevant information will not be available or complete prior to notification Waikato-Tainui cannot provide advice on an important part of the plan change. Comments on other parts of the plan change are included in the table below.

Table 1: Comments on Proposed Plan Change 26 draft provisions

Proposed provision	Comments
Chapter 1.1.6 – Strategic Policy Framework	Support including Te Ture Whaimana at the beginning of the strategic policy framework, ahead of national direction. This recognises Te Ture Whaimana as the primary direction-setting document for the Waikato and Waipaa Rivers, which prevails over any national policy statement. By including Te Ture Whaimana at the forefront of the District Plan, the Waikato and Waipaa Rivers are at the forefront of activities undertaken under the District Plan and recognises that land use and development activities in the city are intrinsically linked to the Rivers.
Chapter 1.3 Objectives and Policies 1.3.1 Objective – Implementation of Te Ture Whaimana o Te Awa o Waikato	Support the inclusion of the objective to implement Te Ture Whaimana and subsequent policies at the forefront of the objectives and policies chapter. The objectives and policies, particularly under implementation of Te Ture Whaimana and Taangata Whenua lack provision for providing for mana whenua values and aspirations as well as providing for involvement in freshwater management and decision-making processes.

Waikato Regional Council staff feedback on Waipā District Council draft plan change 26

General comments

- The Medium Density Residential Zone is a completely new zone applying to what was formerly the Residential Zone. We consider it important that the objectives and policies reflect the MDRS rather than being a repeat of the Residential Zone. As it is a new zone, all parts of the new Section 2A should be able to be submitted on.
- Both existing and new objectives and policies tend to seek to “maintain and enhance” existing elements of residential character. The potential scale of increase in dwellings across the towns of Cambridge, Te Awamutu and Kihikihi would mean that these towns cannot maintain existing amenity. These objectives and policies do not take into account Policy 6 of the NPS-UD which recognises amenity values may change, and that of themselves are not an effect.
- It is difficult to understand zones and qualifying matters without the maps being provided.
- While we understand the scope of this plan change is in direct response to a mandatory direction from central government to enable housing intensification, we suggest there is a real opportunity to embed other consequential changes that would support the objectives of the plan change, as well as other national priorities and outcomes – particularly with regard to giving effect to national and regional climate change policy. We suggest that the plan change opportunity could be used to considerably strengthen objectives, policies, rules and standards around climate change and carbon emissions reduction goals in the context of housing intensification, particularly with respect to integrated transport and land use planning outcomes. Embedding climate change policies and requirements into this plan change is critical to supporting the transformational change that is necessary to address the effects of climate change that is now embedded in national and regional policy.

Transport specific feedback

- Added intensification across each of the towns is likely to have an impact on the transport network. There is no information provided in the draft plan change on any intended amendments to Section 15 – “Infrastructure, Hazards, Development and Subdivision” or Section 16 – “Transportation” to strengthen integrated transport and emissions reduction policies to support housing intensification and the objectives of Plan Change 26, despite the Amendment Act allowing for the inclusion of objectives and policies in addition to those specified to support the medium density residential zone.
- As above, we suggest the plan change needs to more sufficiently embed the comprehensive approach necessary to support climate resilience and reduced carbon emissions in the context of housing intensification. The objectives and policies for both the residential and medium density residential zones only make reference under the comprehensive design and development objectives to (amongst other things) provide for multi-modal transport options and links with existing road, pedestrian and cycleways [2.3.5.1 new(f) and 2A 3.7.1(f)].
- Intensification across the Medium Density Residential Zone will result in many more people living in most areas of Cambridge, Te Awamutu and Kihikihi. It is essential to allow mixed use areas, and expansion of existing commercial zones so that continued reliance on a car as the

main mode of travel is avoided. Densification may solve housing issues but will create transport issues if easy access to day to day needs without using a car is not provided for. We recommend adding objectives, policies and rules that will enable more, or expansion of existing commercial and mixed uses where densification will be occurring.

Other matters

- Section 1.1.20 “National Policy Statements” diagram - needs updating as it refers to the Regional Land Transport Strategy. It should refer to the Regional Land Transport Plan.
- Section 1.1.24 – 1.1.28 discusses the operative Regional Land Transport Plan (RLTP), which has been updated. Section 1.1.28 outlines examples of areas of relevance to Waipa District from the RLTP, including:
 - policies for regionally-significant transport corridors in the Waipa area and beyond;
 - policies regarding integrated land use and transport, freight and economic development, access, mobility and public health, safety and personal security and environmental sustainability; and
 - the development of a regional transport hierarchy...with an expectation of consistency at the local level.

We recommend that this list also includes reference to policies and priorities that direct investment decisions to transform to a low carbon transport system that delivers emissions reductions and supports urban form that can facilitate this transition.

- Section 1.1.29 refers to the current Waikato Regional Policy Statement plan change being undertaken by WRC. We consider this reference should be more specific and refer to the name of the plan change, WRPS Change 1 – National Policy Statement Urban Development and Future Proof Update, or date it to 2022.
- We recommend that the Waipā community spatial plan, Ahu Ake, currently being prepared by Council is referred to in Section 1.1.45.
- If the Residential Zone now only applies to Karapiro, then most of the introduction in Section 2 – Residential Zone is not needed because it refers to other locations in the district.
- Section 2A.1.8(a) is unclear. We recommend that it is reworded to improve clarity.
- Similarly, Section 2A.1.12 is unclear and we recommend rewording.
- Section 2A.3.4 - Amend to Medium Density Residential Zone.
- “Impervious surfaces” is used through the plan change especially in the new Medium Density Residential Zone which does not match the rest of the plan which uses “impermeable surfaces”.
- We support the continued inclusion of CPTED principles. These principles, when implemented provide actual and perceived safety outcomes, and therefore encourage walking and cycling.

- The plan frequently uses “currently” to refer to current circumstances. We recommend the plan instead use dates, i.e., August 2022 or 2022 to ensure that in the future the plan is read in the appropriate context.



04 August 2022

File Ref: LA 062

Waipa District Council,
Private Bag 2402
Te Awamutu
3840

districtplan@waipadc.govt.nz

Attn: Jo-Anne Cook-Munro

Tenā Koe Jo-Anne

HERITAGE NEW ZEALAND POUHERE TOANGA RESPONSE TO DRAFT DOCUMENTS RELATED TO - PROPOSED PLAN CHANGE 26 - RESIDENTIAL ZONE INTENSIFICATION

Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation, and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand Pouhere Taonga is New Zealand's lead historic heritage agency.

HNZPT advocates for Historic Heritage through a range of processes including feedback and formal submissions to statutory and non-statutory process heritage related processes. HNZPT appreciates your approach, via email on 13 July, seeking HNZPT feedback on the draft version of plan change 26 and the s32 document.

We understand the direction that Central Government is taking with requiring district plans to be more facilitating of housing intensification. The need for more housing is well-stated and obvious, and the Waipa District as a Tier 1 urban area is well situated to provide for more housing. We also understand that the Council has little latitude in how this variation is implemented in the District Plan.

Due to the limited time in which to be able to make a response and current resourcing, please be advised that this letter does not constitute the final response of HNZPT with regard the s32 or the plan change itself and HNZPT reserves the right to make additional comments at the time of formal notification.

HNZPT Response:

1. Overview:

HNZPT is supportive that Waipa District Council (WDC) *"has identified and applied the following qualifying matters for Proposed Plan Change 26: (b) Where historic or special character values are present and could be lost through uncontrolled development."* (Page 164). HNZPT understands that WDC is relying for the most part on the existing historic heritage and character objectives, policies, rules and schedules and any related inventories for the protection of historic heritage and character at the time of the proposed intensification. While there are many measures within the existing plan of which HNZPT are supportive, HNZPT does have some reservations with this approach given the current nature of the existing schedules, and the existing primary focus of the heritage rules on activities on the site of a heritage item, which while beneficial in some instances will not provide useful protection in the event



of intensification on an adjacent site, save for Category A items, which are provided some additional protection in such instances. HNZPT would like to offer the following comment around these matters.

2. Existing schedules:

With regard the existing schedules HNZPT is concerned that the schedules may not be sufficiently robust to ensure that the District Plan is effectively managing the protection of historic heritage from inappropriate subdivision, use and development.

HNZPT is concerned that Sites and Areas of Significance to Māori, within the areas subject to the proposed urban intensification, may not have been sufficiently documented within Appendix N2-Cultural Sites, to ensure adverse effects are avoided at the time of intensification. HNZPT would hope that work in this area could be expedited to ensure that the appropriate recognitions are in place to ensure that appropriate protection can be achieved at the time of development.

There are also concerns regarding how up to date the archaeological sites within Appendix N3-Archaeological sites are, given that they are based on the NZAA data base at the time of the district plan renewal some 10-12 years ago. There would be considerable benefit in the review of archaeology in the district to ensure the most important sites are protected in the district plan. As part of the district plan renewal process HNZPT expressed interest in significant archaeological sites schedule in the District Plan and related rules and would welcome discussion to further this important project.

3. Existing objective, policy, and rule framework:

HNZPT has been supportive of the existing objective, policy, and rule framework as tools to manage development on a site containing built heritage, where the proposed development was anticipated to be reasonably subservient to the heritage item. HNZPT is supportive of the policy (Policy-Subdivision and development adjoining Category A heritage items-Page 35) and the associated rule (Page 45) that required a set back at the time of development adjacent to a Category A scheduled item.

HNZPT would want to see this policy and rules retained through the Plan change process. However, HNZPT **seeks** that a review is undertaken on the setback distance to ensure that it will offer an appropriate level of protection to the category A items.

HNZPT considers that the framework does need further measures (additional to those included in this draft document) with regard to assessments related to the impact of a new three level building or larger on the setting and values of an historic heritage item.

4. Proposed Objectives/Policies and Rules for Plan Change 26:

HNZPT supports, or supports subject to amendment, the following text and Objectives, Policies or Rules identified as qualifying matter objectives/policies/rules that will assist to provide protection to historic heritage at the time of intensification:

5. Qualifying matters -Public Open Spaces and Green Infrastructure (Page 63):

HNZPT supports in part the discussion at 2A.1.11-2A.1.13 recognising that the open space network contains many sites of cultural and archaeological significance and welcomes the identified priorities that relate to the protection and restoration of sites of cultural significance. There is some concern that the retention and protection of such sites does not seem to be advocated for as strongly in the Qualifying matters - Cultural, Historic and Special Character (Page 64). HNZPT expects that sites of cultural and archaeological significance should be retained in a range of zonings as needed, not just open space reserve areas.



6. Qualifying matters-Cultural, Historic and Special Character (Page 64):

HNZPT supports in part the discussion in this section however does consider that greater clarity is required regarding these qualifying matters:

- Historic Heritage:

With regard historic heritage, HNZPT **seeks** that the title is amended to either “Cultural, Archaeological and built historic heritage” or “Historic heritage” as this encompasses all aspects.

- Character:

With regard character this discussion uses two distinctive terms: “special character”-typically when referring to the character clusters, and “high existing character” when referring to the character streets. While these terms are discussed within the introductory text (page 32) they are not defined terms. HNZPT considers that there is benefit in making appropriate definitions for these terms and amending the title of the discussion to recognise both types of character; or simply using the wording “Character” in the heading to cover both types.

HNZPT also considers that there would be considerable benefit in the existing character cluster statements (Appendix DG1-Character Cluster Statements) being revised with a greater level of detailing around the nature of the character values in each cluster and their contribution to the overall character and sense of place of Cambridge. The statements should offer further guidance as to nature of appropriate development on the same site including cladding and materials, particularly given the potential for development on the rear of such sites.

In addition, the plan change should provide clear guidance on the difference between character and amenity, noting resource management issues (page 66), where under the amended heading of Residential amenity, with character being deleted, talks of both amenity and character in relation to the character clusters.

In summary, HNZPT seeks the following first two amendments to the text at page 64, and a third amendment at Appendix DG1- Character Cluster Statements:

- the title is amended to recognise all types of “historic heritage”, and,
- the title is amended to recognise both types of character,
- the character cluster statements are revised as stated above, and,
- the plan change provides clear direction on the matters of character, and amenity.

7. Amendments to 2A.4.1-Activity Status Table (Pages 80 & 82):

HNZPT supports the amendments to the activity status table to:

- provide for the demolition of a house in a character cluster as a restricted discretionary activity,
- provide for new buildings as a restricted discretionary activity with new assessment criteria.

8. Qualifying Matter Rule-Dwellings adjoining a Marae (Page 96)

2A.4.2.29 No dwelling shall be placed or constructed so that it has doors, windows, verandahs or outdoor living areas with a direct line of site to the nominal mahua (verandah) or marae atea (areas in front of the Whare Nui) area on the existing Marae.

HNZPT is supportive of this rule and that activities that cannot comply with this performance standard default to a discretionary activity.



9. Qualifying Matter Rule-Yard setbacks (Page 89):

2A.4.2.8-*The minimum building setback depth listed above is modified in the following locations:*

b) on sites adjoining a road where the character street overlay applies, a front yard setback of 6m is required.

HNZPT supports this rule, however **seeks**:

- that the default for activities that do not comply with the setbacks is extended to include rule 2A.4.2.8, and
- the matters over which discretion is extended is amended as follows (addition underline):
Consistency of front yard building setback and effects on established character values along the identified character street.

10. Additional rules to assist to mitigate the effects of intensification on historic heritage:

HNZPT considers that the Plan change would benefit from the addition of the following measures to ensure improved protection of historic heritage at the time of intensification.

HNZPT **seeks** the following new objectives/policies or rules:

- HNZPT would support the consideration and inclusion into the plan change of a setback or reduced height to boundary rules on sites adjacent to a range of historic heritage items, at the time of development, as a way to assist to mitigate the impacts of intensification. This would need to be supported by a relevant policy framework.

Heritage New Zealand looks forward to working with Waipa District Council in an ongoing basis in relation to Plan Change 26. Please contact Carolyn McAlley at [REDACTED] in the first instance, if you have any queries regarding this letter.

Nāku noa, nā

Ben Pick
Area Manager Lower Northern