

**From:** info@waipadc.govt.nz  
**Sent:** Friday, 30 September 2022 4:07 pm  
**To:** Policy Shared  
**Subject:** External Sender: Waipā District Plan - Plan Change Submission Form 5 - Jay El Limited

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**Full name of submitter** Jay El Limited  
**Contact name (if different from above)** Hamish Ross  
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**Address for service** 103 Market Street, Te Awamutu 3800  
  
**Contact phone number** 027-2156346

**This is a submission on the following proposed plan change to the Waipā District Plan**  
 #26 - Residential Zone Intensification

**Could you gain an advantage in trade competition through this submission?** I could not

**Are you directly affected by an effect of the subject matter that - (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition?** I am

**Do you wish to be heard (attend and speak at the Council hearing) in support of your submission?** I do

**If others make a similar submission, will you consider presenting a joint case with them at the hearing?** Yes

**Do you support the proposed change(s)?** I support in part

**The specific provisions of the plan change my submission relates to are (give details):**  
 Please refer to the attached letter

**My submission is**  
 Please refer to the attached letter

**I seek the following decision/s from Council**  
 Please refer to the attached letter

#### Attachments

[C19109-RC-PC26 Submission.pdf](#)

30 September 2022

Planning Team  
Waipā District Council  
23 Wilson Street  
Cambridge 3434

**Our Ref:** C19109

Dear Planning Team,

**RE: Submission on Plan Change 26 – Residential Zone Intensification**

Further to the notification of Plan Change 26 – Residential Zone Intensification on the 19<sup>th</sup> August 2022, please find the below points outlining Jay El Limited's submission on the Plan Change.

Overall, Jay El Limited is supportive of the proposed plan change. However, there are a number of aspects of the plan change that we request be amended to achieve better outcomes.

**Point 1 – Windows to Street in the Medium Density Residential Zone**

Proposed wording under Plan Change 26:

*2A.4.2.21 Any residential dwelling facing the street must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.*

It is considered that this is an excessive requirement, that will result in inefficient outcomes with regards to thermal loss. In particular, this blanket approach doesn't account for orientation of the façade, and whether the loss from such a large area of glazing can be balanced with solar gains from sunlight access.

Requested wording:

*2A.4.2.21 Any residential dwelling facing the street:*  
*(a) On a northern orientation must have a minimum of 2015% of the street-facing façade*  
*in glazing- and*

(b) On a southern orientation must have a minimum of 8% of the street-facing façade in glazing.

*This can be in the form of windows or doors. Orientation of façade shall be determined using the methodology in Appendix O6.*

## **Point 2 – Neighbourhood Amenity and Safety in the Medium Density Residential Zone**

Proposed wording under Plan Change 26:

2A.4.2.31 *The minimum area of glazing on the front façade(s) of a building that adjoins a reserve shall be 15%. Provided that:*

- (a) Where a site adjoins a reserve, the front façade(s) of a building shall be all the sides of a building that faces the public place; and*
- (b) Where the front façade(s) of a building is not parallel to a reserve, the minimum area of glazing shall only apply to the longest wall facing the public place; and*
- (c) Where the front façade(s) of a building is not parallel to a reserve and the façades facing the reserve are of equal length, then the façade at the least acute angle to the public place shall be deemed to be the front façade and the 15% glazing requirement shall only apply to that façade; and*
- (d) The percentage area of glazing shall be measured as the framed wall opening size to accommodate the entire window.*
- (e) This rule shall not apply to relocated buildings or a garage that is an accessory building.*

It is considered that this is an excessive requirement, that will result in inefficient outcomes with regards to thermal loss. In particular, this blanket approach doesn't account for orientation of the façade, and whether the loss from such a large area of glazing can be balanced with solar gains from sunlight access.

Requested wording:

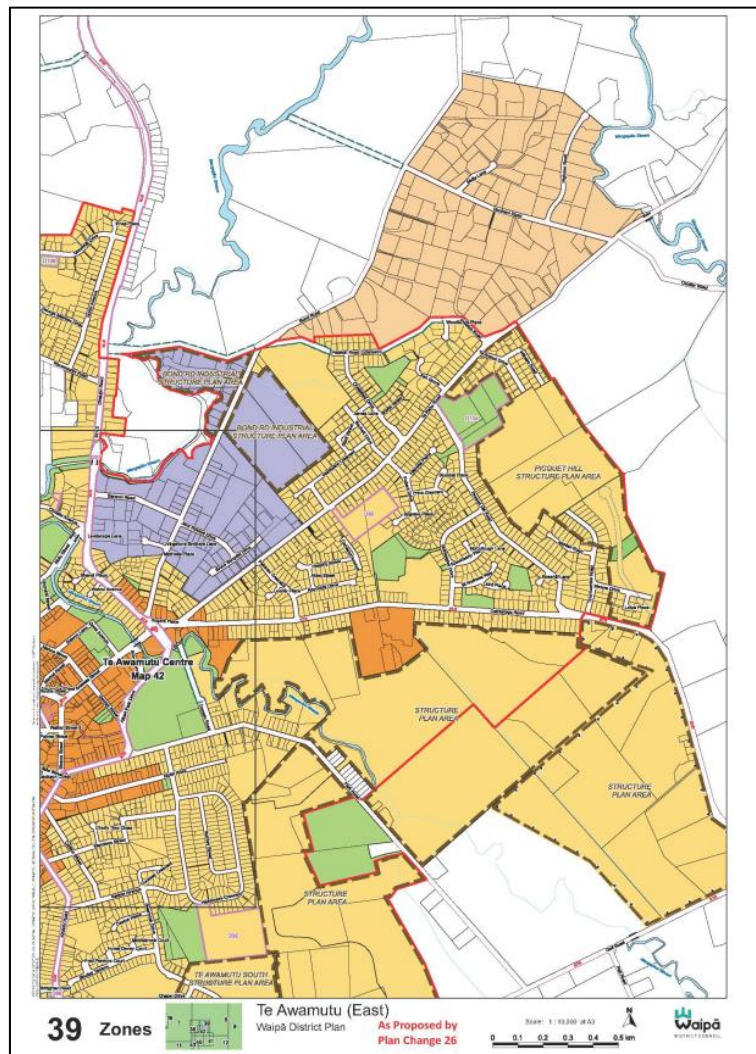
2A.4.2.31 *The minimum area of glazing on the front façade(s) of a building that adjoins a reserve shall be 15% for the façade facing a northern orientation, and 8% for the façade facing a southern orientation, using the methodology in Appendix O6. Provided that:*

- (a) Where a site adjoins a reserve, the front façade(s) of a building shall be all the sides of a building that faces the public place; and*

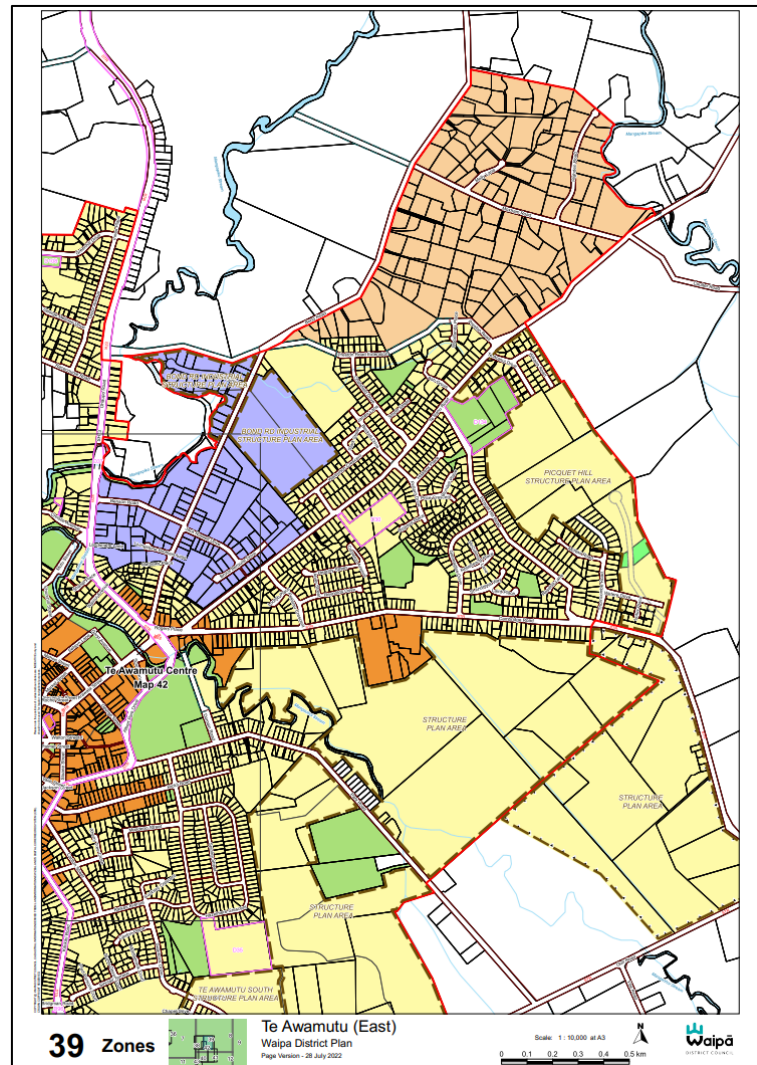
- (b) Where the front façade(s) of a building is not parallel to a reserve, the minimum area of glazing shall only apply to the longest wall facing the public place; and
- (c) Where the front façade(s) of a building is not parallel to a reserve and the façades facing the reserve are of equal length, then the façade at the least acute angle to the public place shall be deemed to be the front façade and the 15% above -glazing requirement shall only apply to that façade; and
- (d) The percentage area of glazing shall be measured as the framed wall opening size to accommodate the entire window.
- (e) This rule shall not apply to relocated buildings or a garage that is an accessory building.

### Point 3 – Zone Map 39 – Te Awamutu (East)

Proposed zone map under Plan Change 26:



It is noted that there is a discrepancy between the Urban Limit on the proposed zoning map shown above and the extent of the zoning allowing residential development. Further, the above Urban Limit is not consistent with the location of it in the current zone and policy maps under the Operative District Plan, refer below. Namely, this discrepancy is located where the Urban Limit traverses the T11 growth cell. Please rectify this, which appears to be a simple mapping error.



If you require any further information, please contact the writer.

Yours faithfully

**CKL Planning | Surveying | Engineering | Environmental**

**Hamish Ross**  
**Director – Licensed Cadastral Surveyor**