

**SUBMISSION ON PLAN CHANGE 26 TO THE WAIPA DISTRICT PLAN UNDER  
CLAUSE 6 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT  
1991**

**To:** districtplan@waipadc.govt.nz

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## **INTRODUCTION**

1. This is a submission on the Plan Change 26 to the Waipā District Plan (**Plan Change**) on behalf of Metlifecare Limited (**Metlifecare**). The Plan Change was notified by Waipā District Council on 19 August 2022.
2. This submission relates to the provisions in the Plan Change relating to the use and development of retirement villages in the district.
3. Metlifecare could not gain an advantage in trade competition through this submission.

## **BACKGROUND TO METLIFECARE**

4. Metlifecare was established in 1984 and is a leading owner and operator of retirement villages in New Zealand. Metlifecare focuses on providing outstanding care and ensuring the comfort, happiness, and wellbeing of its residents by developing and maintaining high quality housing and creating dynamic, vibrant, and diverse social communities for older people throughout New Zealand.
5. Metlifecare operates using a range of different development models which generally include a variety of residential unit layouts ranging from apartments and townhouses for independent living, through to assisted living apartments and residential care homes with rest home to hospital level care for residents who need additional assistance.

6. Metlifecare is actively providing feedback to all councils on their district plans to recognise and provide for retirement villages in appropriate locations. Metlifecare owns and operates one retirement village in the Waipā District, being Metlifecare St Andrew's, 41 Bryce Street, Cambridge.

## **OVERALL COMMENT ON PLAN CHANGE**

7. Retirement villages are communities specifically designed to cater to the needs and lifestyles of older people who are some of the most vulnerable members of the community. As New Zealand's population grows and ages, the continued supply of retirement village housing will be crucial to ensure that the elderly population have suitable housing that meets their needs.
8. The local community benefits from the provision of retirement villages. For example, they release pressure on social and health services and contribute to employment in New Zealand, both in the construction sector and day-to-day operations. They also have a crucial role in the general housing market because the supply of retirement village housing releases existing housing stock into the market.
9. There are currently 345,960 New Zealanders over 75 and estimated this will reach 832,810 by 2048. The demand for retirement village units continues to grow as a reflection of this population increase, and an estimated 24,413 new units will be required by 2033.<sup>1</sup>
10. While development continues, market challenges including the global pandemic, rising inflation, labour shortages, supply chain constraints and development constraints continue to put pressure on the industry. A recent Market Review by JLL concluded that retirement villages across New Zealand continue to deliver new units to meet increasing demand, however demand is outstripping development pipeline demand.
11. Overall, it is critical that the Plan Change adequately recognises these development constraints and provide clear direction for the establishment of retirement villages in appropriate locations in the Waipā District by ensuring the objectives, policies, and rules more clearly recognise the functional and operation needs of this housing typology.

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<sup>1</sup> JLL's 10<sup>th</sup> White Paper - Retirement Villages Market Review 2022, dated July 14 2022.

12. It is also necessary for the Plan Change to give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**) and Resource Management (Enabling Housing and Other Matters) Amendment Act 2021 (**Amendment Act**), to provide for more intensive development and to recognise that the built form of our urban areas will change to provide greater housing choice and supply.
13. Metlifecare generally opposes Waipā District Council's approach to implementing the NPS-UD and the Amendment Act. In particular Metlifecare seeks that:
  - (a) provisions for the Residential Zone and Medium Density Residential Zone recognise the need for retirement villages and that existing residential character and amenity will change over time;
  - (b) unnecessary qualifying matter overlays are removed from the planning maps; and
  - (c) the objectives, policies, rules, and standards applicable to retirement village development recognise the social and health benefits of the activity and provide for the functional and operational needs of this type of development.
14. The specific provisions of the Plan Change that are supported or opposed are set out in the table at **Appendix 1** to this submission.

## **REASONS FOR RELIEF SOUGHT**

15. The reasons for the relief sought are set out in **Appendix 1**. In addition to the specific reasons in Appendix 1, the relief sought by Metlifecare seeks to ensure that the Plan Change:
  - (a) will give effect to the objectives and policies of the NPS UD;
  - (b) will contribute to well-functioning urban environments;
  - (c) is consistent with the sustainable management of physical resources and the purpose and principles of the RMA;
  - (d) will meet the requirements to satisfy the criteria of section 32 of the RMA;

- (e) will meet the reasonably foreseeable needs of future generations; and
- (f) is consistent with sound resource management practice.

#### **DECISION SOUGHT AND HEARING**

- 16. The relief sought by Metlifecare is set out in **Appendix 1**. In addition to that specific relief, Metlifecare seeks such other additional or consequential relief to give effect to the matters raised in this submission.
- 17. Metlifecare wishes to be heard in support of its submission.
- 18. If others wish to make a similar submission, Metlifecare will consider presenting a joint case with them at the hearing.

**DATED** this 30<sup>th</sup> day of September 2022

**Metlifecare Limited** by its solicitors and duly  
authorised agents MinterEllisonRuddWatts




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Bianca Tree

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## APPENDIX 1: Metlifecare's submission on Plan Change 26 to Waipa District Plan

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
General approach		Oppose	Metlifecare generally opposes the approach that has been taken to the application of the Amendment Act. One area (Karapiro) has been identified as being located in the Residential zone. Three areas (Cambridge, Kihikihi and Te Awamutu) have been identified as being located in a new Medium Density Residential zone.	Amendments should be made to better align the Residential and Medium Density zone provisions with the requirements in the Amendment Act and NPS-UD.
Section 01 – Strategic Policy Framework	1.3.3.2 Policy – Out of sequence and out of zone plan changes	Support	It is important to provide for out of sequence development where it is well considered and necessary as required by Policy 8 of the NPS-UD.	Retain 1.3.3.2, shown below, as notified.  <u>Policy – Out of sequence and out of zone plan changes</u>  <u>1.3.3.2 To have regard to potential plan changes that are otherwise not enabled or not in sequence with the planned release of land where that plan change would:</u>  <u>(a) contribute to a well-functioning urban environment; and</u>  <u>(b) provide the necessary infrastructure required for the proposed development; and</u>  <u>(c) be well connected to public transport and transport corridors; and</u>  <u>(d) provide significant development capacity.</u>
Residential zone	2.1 Introduction	Oppose	An amendment is required to reflect the intent of the Amendment Act which is to recognise the changing nature of residential areas and encourage high-quality developments, rather than require maintenance of character and amenity values.	Amend 2.1 Introduction as shown in red below (or words to similar effect):  Providing for changing housing demands while <u>encouraging high-quality developments will be important to create a well-functioning urban environment maintaining existing character and amenity expectations will be challenging</u> . There are Town Concept Plans 2010 prepared for Ngāhinapōuri, Ōhaupo and Pirongia. Cambridge, Te Awamutu and Kihikihi. The Town Concepts Plans provide guidance on how these competing demands can be managed.
	Resource Management Issues - New issue 2.2.[8] – Providing a range of housing typologies	Support	The focus of the provisions in the Residential zone is on maintaining and enhancing the existing elements of towns that give them their unique character.  Metlifecare recognises this desire but also considers that the Plan must reflect and adapt to the changing needs of society, including our aging population.	Provide the following, as a resource management issue (or words to similar effect):  <u>Aging population</u>  <u>New Zealand has an aging population and, as a result, greater consideration needs to be given to the health, welfare and housing needs of older people in the community. As New Zealand's population grows and ages, the continued supply of retirement village housing will be crucial to ensure that the elderly population have suitable housing that meets their needs.</u>  <u>There is a need to recognise and provide for retirement village development and recognise that the existing character and amenity of the Residential zone will change over time to enable a variety of housing types with a mix of densities.</u>
	2.3.5.1 - Policy – Comprehensive design of retirement village accommodation and associated care facilities, rest homes, and visitor accommodation	Support in part	Metlifecare seeks that this policy also recognises the planned built form, and the operational and functional needs of retirement villages.	Amend 2.3.5.1 as shown in red below (or words to similar effect):  To ensure that <del>in-fill housing, compact housing,</del> retirement village accommodation and associated care facilities, rest homes and visitor accommodation are comprehensively designed by:  (a) Ensuring that developments effectively relate to the street, existing buildings, <del>and</del> adjoining developments in the neighbourhood <u>and the areas planned built form</u> ; and  (b) <del>Ensuring that in the Cambridge Residential Character Area new dwellings between existing dwellings on the site and the road shall be avoided; and</del>  ...  <u>While recognising the functional and operational needs of retirement village development.</u>

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	Rule 2.4.1.3 – Restricted discretionary activities	Oppose	<p>Metlifecare generally supports the matters of discretion. However, it should be made clear which of the rules apply to retirement villages as a restricted discretionary activity.</p> <p>The relevant rules have been set out in Metlifecare's proposed relief. They recognise that retirement village development is different from other types of residential development and therefore should not be required to comply with, or be assessed against, all of the rules as a restricted discretionary activity.</p> <p>The matters of discretion should also recognise that retirement villages provide necessary accommodation and care for elderly people who have different housing and care needs compared to the rest of the population. They also have certain functional and operational requirements which need to be taken into consideration, for example, they may require greater density than the planned urban built character to enable efficient provision of services. They may also have unique layout and internal amenity needs to cater for the requirements of residents as they age.</p> <p>Metlifecare otherwise opposes the individual rules that should not be applied to retirement village development.</p>	<p>Amend 2.2.1.3 as shown in red below (or words to similar effect):</p> <p><u>The following rules apply to retirement village development and associated care facilities and rest homes:</u></p> <p><u>2A.4.2.1 – Height (as amended below)</u></p> <p><u>2A.4.2.2 – Height in relation to boundary</u></p> <p><u>2A.4.2.4 - 6 - Setbacks</u></p> <p><u>2A.4.2.7 – 8 – Building coverage (as amended below)</u></p> <p><u>2A.4.2.9 – Impermeable surfaces</u></p> <p><u>2A.4.2.23 – Landscaped area</u></p> <p><u>2A.4.2.37 – Noise</u></p> <p><u>2A.4.2.38 – Vibration</u></p> <p><u>2A.4.2.39 – Construction noise</u></p> <p><u>2A.4.2.40 – 42 – Noise insulation: noise sensitive activities</u></p> <p><u>2A.4.2.44 - Signs</u></p> <p><u>2A.4.2.48 – 49 – Buildings and structures within the National Grid Yard</u></p> <p><u>2A.4.2.50 – 52 – Housing and keeping of animals</u></p> <p>Discretion will be restricted to the following matters:</p> <ul style="list-style-type: none"> <li>• Building location, bulk and design; and</li> <li>• Landscaping; and</li> <li>• Location of parking areas and vehicle manoeuvring; and</li> <li>• CPTED; and</li> <li>• Traffic generation and connectivity; and</li> <li>• <u>The functional and operational needs of a retirement village; and</u></li> <li>• Benefits provided to residents from onsite communal facilities; and</li> <li>• Noise; and</li> <li>• Stormwater disposal.</li> </ul> <p>The matters will also be considered in accordance with the assessment criteria in Section 21.</p> <p>It should also be clarified that retirement village development is a restricted discretionary activity regardless of any infrastructure or stormwater constraints which will be considered as part of the application.</p>
	New Rule 2.4.1.3 – Restricted discretionary activities – Restricted discretionary activities – Retirement village accommodation and associated care facilities and rest homes that fails to comply with the applicable standards	Support	<p>Retirement villages are provided for as a restricted discretionary activity. However, any restricted activity that does not comply with certain standards or one or more of the rules for a restricted discretionary activity is a discretionary activity.</p> <p>Metlifecare seeks more certainty on the assessment of retirement village applications that do not comply with the relevant rules.</p> <p>In Metlifecare's view, it is appropriate for retirement villages that do not comply with the relevant rules and standards to remain a restricted discretionary activity. The matters of discretion will then relate to the effects of not complying with the relevant rules and standards and any applicable policies.</p>	<p>Provide a new rule as follows (or words to similar effect):</p> <p><u>Retirement village development and associated care facilities and rest homes are restricted discretionary activities that fail to comply with the following set out in 24.4.1.3(e) (as set out above).</u></p> <p><u>Discretion will be restricted to the following matters:</u></p> <p>a. <u>The extent and effect of non-compliance with the particular rule; and</u></p> <p>b. <u>Policy 2.3.5.1.</u></p>
	Rule 2.4.2.9 – Maximum height	Oppose	The Plan proposes to provide that buildings in the residential zone will have a maximum height of 9m (or no more than two	Amend this rule to align with the MDRS in the Amendment Act.



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			storeys). This does not give effect to the Amendment Act and should be increased to 11m (or three storeys).  New residential areas may be established in this zone. They are required to implement the MDRS under the Amendment Act.	
	Rule 2.4.2.12 – Maximum site coverage	Oppose	The Plan proposes to require site coverage to be no more than 40% of the net site area.	Amend this rule to align with the MDRS in the Amendment Act.
Proposed Section 2A – Medium Density Residential Zone	Resource management issues - Changing housing demands 2A.1.13 – 15	Support in part	Metlifecare seeks to expand the resource management issue relating to the increasing and changing housing demand.  This is the focus of the Amendment Act and should be better reflected in these provisions.  As New Zealand's population grows and ages, the continued supply of retirement village housing will be crucial to ensure that the elderly population have suitable housing that meets their needs. The functional and operational needs of this type of development (and other more intensive residential development) should be recognised as an issue that must be addressed.	Amend 2A.1.13 as shown in red below (or words to similar effect): <ul style="list-style-type: none"> <li>2A.1.13 There is a requirement to meet a wide range of housing needs including for families, single or two person households; and options for extended families.</li> <li>2A.2.14 In order to meet the needs of an ageing population there is a need to provide a range of housing options and types with an appropriate range of facilities.</li> <li>2A.2.15 <u>It should be recognised that the character and amenity of existing areas will change over time to enable a variety of housing types with a mix of densities.</u></li> <li><u>2A.2.[16] The functional and operational needs of different housing solutions must be recognised and provided for.</u></li> <li><u>2A.2.[17] There is a need to enable more intensive development on larger sites to provide for the efficient use of those sites where they can mitigate adverse effects on adjoining sites.</u></li> <li>2A.2.[158] In the future there may be increased demand for marae and papakāinga developments within Medium Density Residential Zones.</li> </ul>
	2A.3.3 – Objective – Key elements of residential character	Oppose	The objectives and policies should recognise the diversity required to create a residential environment, and that residential environments and amenity values change over time.  Objective 2A.3.3 does not adequately reflect the purpose and implementation of the Medium Density Residential Standards (MDRS). It seeks to provide quality amenity but does not recognise the changing nature of residential environments.  This objective should be updated to be consistent with the Amendment Act and the intent of the Act which is to enable residential development and to recognise the changing nature of the built environment.	Amend 2A.3.3 as shown in red below (or words to similar effect):  <u>To maintain and enhance the existing elements of the Residential Zone that give each town its own character while recognising that the character and amenity of these areas will change over time.</u>
	2A.3.4 – Objective – Neighbourhood amenity and safety	Oppose	This objective is not necessary – it overlaps with 2A.3.5 and can be consolidated as further explained below.	Delete 2A.3.4 as shown in red below:  <u>To maintain amenity values and enhance safety in the Medium Density Residential Zone.</u>
	2A.3.5 – Objective – On-site amenity values	Oppose	Amendments are proposed to be made to clarify that the intention is to encourage high amenity values rather than maintain amenity values. Metlifecare supports this amendment as it is consistent with policy 6(b) of the NPS UD.	Amend 2A.3.5 as shown in red below (or words to similar effect):  2A.3.5 – Objective – On-site <u>and neighbourhood</u> amenity values  <u>To enhance safety -maintain-and-enhance and encourage high amenity values within-and-around dwellings and sites in the Medium Density Residential Zone through the location, layout and design of dwellings and buildings-, while recognising the functional and operational requirements of activities.</u>
	2A.3.6.5 Policy - Retirement village accommodation and	Support	Metlifecare supports enabling the development of retirement village accommodation and associated care facilities and rest homes, to meet the needs of an ageing population providing that the development is comprehensively designed and developed.	Retain 2A.3.6.5 as notified.





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	associated care facilities and rest homes			<p><u>Policy - Retirement village accommodation and associated care facilities and rest homes</u></p> <p><u>2A.3.6.5 To enable the development of retirement village accommodation and associated care facilities and rest homes, to meet the needs of an ageing population providing that the development is comprehensively designed and developed.</u></p>
	2A.3.7 – Objective – Comprehensive design and development	Support	These are appropriate considerations when considering the design and development of residential development.	<p>Retain 2A.3.7 as notified.</p> <p><u>Objective - Comprehensive design and development</u></p> <p><u>2A.3.7 To encourage developments that are comprehensively designed, incorporate urban design and CPTED principles, are co-ordinated with infrastructure provision, and integrated with the transportation network.</u></p>
	2A.3.7.1 – Policy – Comprehensive design of compact housing, retirement village accommodation and associated care facilities, rest homes, and visitor accommodation	Support in part	<p>This policy recognises the specific requirements of retirement villages and identifies the relevant effects that should be considered as part of any resource consent application.</p> <p>Minor amendments are proposed for clarity and to recognise that these considerations should take place while recognising the specific requirements of retirement villages due to their functional and operational needs.</p>	<p>Amend 2A.3.7.1 as shown in red below (or words to similar effect):</p> <p><u>To ensure that compact housing, retirement village accommodation and associated care facilities, rest homes and visitor accommodation are comprehensively designed by:</u></p> <p><u>(a) Ensuring that developments effectively relate to the street, existing buildings, and adjoining developments in the neighbourhood and the planned built form of the area; and</u></p> <p><u>(b) Avoiding long continuous unbroken lengths of building wall; and</u></p> <p><u>(c) Maximising the potential for passive solar gain; and</u></p> <p><u>(d) Providing for sufficient private or communal space for the reasonable recreation, service and storage needs of residents; and</u></p> <p><u>(e) Retaining existing trees and landscaping within the development where this is practical; and</u></p> <p><u>(f) Where appropriate provide for multi-modal transport options and provide for links with existing road, pedestrian and cycleways (where relevant); and</u></p> <p><u>(g) Incorporating CPTED principles; and</u></p> <p><u>(h) Addressing reverse sensitivity effects; and</u></p> <p><u>(i) Mitigating adverse effects related to traffic generation, access, noise, vibration, and light spill; and</u></p> <p><u>(j) Being appropriately serviced and co-ordinated with infrastructure provision and integrated with the transport network.</u></p> <p><u>While recognising the functional and operational needs of retirement village development.</u></p>
	2A.4.1.3 – Restricted discretionary activities – (e) Retirement village accommodation and associated care facilities and rest homes within or outside the compact housing overlay identified on the Planning Maps	Oppose in part	<p>Metlifecare generally supports the matters of discretion. However, it should be made clear which of the rules apply to retirement villages as a restricted discretionary activity.</p> <p>The relevant rules have been set out in Metlifecare's proposed relief. They recognise that retirement village development is different from other types of residential development and therefore should not be required to comply with, or be assessed against, all of the rules as a restricted discretionary activity.</p> <p>The matters of discretion should also recognise that retirement villages provide necessary accommodation and care for elderly people who have different housing and care needs compared to the rest of the population. They also have certain functional and operational needs which need to be taken into consideration, for example, they may require greater density than the planned urban built character to enable efficient provision of services. They may also have unique layout and internal amenity needs to cater for the requirements of residents as they age.</p>	<p>Amend 2A.4.1.3 as shown in red below (or words to similar effect):</p> <p><u>The following rules apply to retirement village development and associated care facilities and rest homes:</u></p> <p><u>2A.4.2.1 - Height</u></p> <p><u>2A.4.2.2 – Height in relation to boundary</u></p> <p><u>2A.4.2.4 - 6 - Setbacks</u></p> <p><u>2A.4.2.7 – 8 – Building coverage</u></p> <p><u>2A.4.2.9 – Impermeable surfaces</u></p> <p><u>2A.4.2.23 – Landscaped area</u></p> <p><u>2A.4.2.37 – Noise</u></p> <p><u>2A.4.2.38 – Vibration</u></p> <p><u>2A.4.2.39 – Construction noise</u></p> <p><u>2A.4.2.40 – 42 – Noise insulation: noise sensitive activities</u></p> <p><u>2A.4.2.44 - Signs</u></p> <p><u>2.A.4.2.48 – 49 – Buildings and structures within the National Grid Yard</u></p>



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			Metlifecare otherwise opposes the individual rules that should not be applied to retirement village development.	<p><a href="#">2A.4.2.50 – 52 – Housing and keeping of animals</a></p> <p>Discretion will be restricted to the following matters:</p> <ul style="list-style-type: none"> <li>• Building location, bulk and design; and</li> <li>• Landscaping; and</li> <li>• Location of parking areas and vehicle manoeuvring; and</li> <li>• CPTED; and</li> <li>• Traffic generation and connectivity; and</li> <li>• <a href="#">The functional and operational needs of a retirement village; and</a></li> <li>• Benefits provided to residents from onsite communal facilities; and</li> <li>• Noise; and</li> <li>• Stormwater disposal.</li> </ul> <p>The matters will also be considered in accordance with the assessment criteria in Section 21.</p> <p>It should also be clarified that retirement village development is a restricted discretionary activity regardless of any infrastructure or stormwater constraints which will be considered as part of the application.</p>
	New Rule in Rule 2A.4.1.3 – Restricted discretionary activities – Retirement village accommodation and associated care facilities and rest homes that fails to comply with the applicable standards	Support	<p>Retirement villages are provided for as a restricted discretionary activity. However, any activity that does not comply with certain standards or one or more of the rules for a restricted discretionary activity is a discretionary activity.</p> <p>Metlifecare seeks more certainty on the assessment of retirement village applications that do not comply with the relevant rules.</p> <p>In Metlifecare's view, it is appropriate for retirement villages that do not comply with the relevant rules and standards to remain a restricted discretionary activity. The matters of discretion will then relate to the effects of not complying with the relevant rules and standards and any applicable policies.</p>	<p>Provide a new rule as follows (or words to similar effect):</p> <p><a href="#">Retirement village development and associated care facilities and rest homes are restricted discretionary activities that fail to comply with the following set out in 2A.4.1.3(e) (as set out above).</a></p> <p><a href="#">Discretion will be restricted to the following matters:</a></p> <p>c. <a href="#">The extent and effect of non-compliance with the particular rule; and</a></p> <p>d. <a href="#">Policy 2A.3.7.1.</a></p>
	Rule – Earthworks 2A.4.2.46	Oppose	It is not appropriate for the Plan to include a restriction on the volume of earthworks which would unnecessarily limit residential development. Regional resource consents may separately be required for significant earthworks.	<p>Delete 2A.4.2.46 Rule – Earthworks</p> <p><a href="#">Rules - Earthworks</a></p> <p><a href="#">Earthworks shall not exceed a total volume of 25m³ or a total area of 250m² in a single activity or in cumulative activities in any calendar year, provided that this rule shall not apply to earthworks incidental to an approved resource consent or building consent.</a></p> <p><a href="#">Advice Notes:</a></p> <ol style="list-style-type: none"> <li>1. <a href="#">All works must comply with the New Zealand Electrical Code of Practice for Electrical Safe Distances NZECP 34:2001.</a></li> <li>2. <a href="#">Earthworks complying with permitted activity standards or subject to resource consent requirements under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health Regulations 2011, are exempt from additional resource consent requirements.</a></li> <li>3. <a href="#">Earthworks within 23m of lakes or water bodies require resource consent. Refer Section 26 - Lakes and Water bodies.</a></li> </ol> <p><a href="#">Activities that fail to comply with this rule will require a resource consent for a discretionary activity.</a></p>

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Section 21 - Assessment Criteria and Information Requirements	Assessment Criteria in Residential zone	Oppose	As below.	Amend 21.1.2.4 as below and otherwise remove (o) as notified.
	Assessment Criteria in Medium Density Residential zone	Oppose	<p>The Council has sought to apply the current assessment criteria in section 21 of the District Plan to restricted discretionary activities in the new Residential - Medium Density zone.</p> <p>These should not provide a range of additional rules, they should require more detailed consideration of certain relevant matters that are relevant in light of the new planning framework.</p> <p>They have also been removed in relation to the Residential zone.</p>	<p>Amend 21.1.2A.3 as follows (or words to similar effect):</p> <p>Retirement village accommodation and associated care facilities and rest homes within or outside the compact housing overlay identified on the Planning Maps</p> <p>(a) <del>Building design including:</del>  <del>(i) The extent to which solar potential and good solar aspect is optimized within the development; and</del>  <del>(ii) Colours; and</del>  <del>(iii) The materials to be used and how they are to be repeated within the development; and</del>  <del>(iv) Detail of roof pitches; and</del>  <del>(v) Details of doorways and the provision of shelter for visitors; and</del>  <del>(vi) Windows, revetment, balconies and recesses; and</del>  <del>(vii) Garaging to create visual continuity and cohesion and reflect a residential character; and</del>  <del>(viii) Whether designs avoid monolithic walls in favour of designs that incorporate smaller scale building elements to promote feelings of interest and diversity.</del></p> <p><del>(b) Visually permeable fences and glazing of façades that provide for surveillance from the dwelling to the street and other public places such as walkways and reserves.</del></p> <p>(c) Integration with neighbouring residential development that is responsive to <del>local</del> <u>residential</u> character in terms of its façade treatment, including building proportions, detailing, materials and landscape treatment.</p> <p><del>(d) Outdoor living spaces for independent living units that are private and have good access to sunlight in midwinter and/or have access to a range of communal landscaped outdoor areas that are orientated such that they have good solar aspect.</del></p> <p>(e) The location of outdoor storage areas and rubbish and recycling compounds such that the appearance from the street is not adversely affected and on-site amenity, such as the provision of outdoor living spaces is not compromised.</p> <p><del>(f) The design of the road boundary setback:</del>  <del>(i) Street definition – the extent to which units as opposed to garages orient and face the street creating a strong interface between the public and private domains. Designs need to avoid street frontages that are dominated by garages and outdoor storage areas; and</del>  <del>(ii) Landscaping – the type and nature of the landscaping both within the front yard setback and throughout the development so that it contributes both to the neighbourhood and to on-site amenity; and</del>  <del>(iii) Access way design – the width and proportion of the frontage as well as the landscaping and the materials to be used.</del></p> <p><del>(g) The provision of connections to public walkways/cycleways and the road network.</del></p> <p><del>(h) Open space character including on-site landscaping, retention of mature trees, and provision of shared driveways.</del></p> <p>(i) Adequate <u>and safe vehicle access</u> parking <del>(excluding consideration of the number of parking spaces for cars) and the provision of safe vehicle entrances</del> for pedestrians and vehicles, <del>car parking and</del> manoeuvring and vehicle access to rubbish and recycling compounds, <u>and</u> access for emergency vehicles.</p> <p>(j) The provision of lighting for amenity and crime prevention without being a nuisance to residents.</p> <p>(k) The extent of effects on the surrounding road network including the function of intersections.</p> <p>(l) Aural privacy including the noise levels anticipated from on-site and adjacent land uses and the provision of acoustic treatment.</p> <p>(m) The adequacy of on-site stormwater disposal methods.</p>

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				<p>(n) The adequacy of the servicing proposed for the development.</p> <p>(o) The extent to which the site is suitable for the development.</p> <p>(p) The benefits provided to residents from communal facilities being provided on site.</p>
Section 18 – Financial Contributions - 18.4 Objectives and Policies	Rules – Purpose of financial contributions - 18.5.1.4 – Residential amenity	Oppose	<p>Metlifecare does not consider it appropriate that the Council require financial contributions to offset any adverse effects on the environment.</p> <p>If an application for consent is granted, it is accepted that the resulting level of effect is appropriate (because adverse effects are avoided, remedied, mitigated or offset). Requiring a developer to contribute to additional offsetting, is not appropriate.</p> <p>It is noted that development contributions are already required for reserves.</p>	<p>Delete 18.5.1.4 in full.</p> <p><u>To avoid, remedy, and mitigate the adverse effects of residential development density, or ensure positive effects on the environment to offset any adverse effect, through the recovery of costs associated with maintaining and improving residential amenity.</u></p> <p><u>(a) These costs will include:</u></p> <p><u>(i) Where public open spaces can be improved, the cost of land acquisition and development; and</u></p> <p><u>(ii) Where streetscape amenity can be enhanced, the cost of that enhancement.</u></p>
Qualifying matters (Map 56)	Stormwater Constraint	Oppose	<p>Insufficient justification has been provided to include the majority of the urban areas in Waipa within a Stormwater Constraint qualifying matter area.</p> <p>Stormwater infrastructure and servicing should be a relevant consideration, where appropriate, but should not otherwise affect the ability to development sites across the urban area.</p>	Remove the Stormwater Constraint qualifying matter from the Plan.
	Infrastructure Constraint	Oppose	Insufficient justification has been provided to include the majority of the urban areas in Waipa within an Infrastructure Constraint qualifying matter area.	Remove the Infrastructure Constraint qualifying matter from the Plan.
	41 Bryce Street, Cambridge	Oppose	<p>The site at 41 Bryce Street in Cambridge is an existing retirement village development.</p> <p>It is unclear why the stormwater and infrastructure constraint qualifying matters have been applied to this site (shown below), when it is an existing retirement village with adequate infrastructure.</p> <p>This approach is not consistent with policy 2A.3.2.2.4 which seeks to enable the modification of the MDRS only to the extent necessary to accommodate a qualifying matter applying to that site.</p>	Apply the Medium Density Residential zoning and remove the Stormwater and Infrastructure qualifying matter constraints from 41 Bryce Street, Cambridge.

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			<div><div><div> Qualifying Matter - River/Gully Proximity</div><div> Qualifying Matter - Stormwater Constraint</div><div> Qualifying Matter - Infrastructure Constraint</div></div></div>	