

BEFORE THE HEARING PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change 26 to the Operative Waipā
District Plan

REBUTTAL STATEMENT OF EVIDENCE OF CAROLYN JOY HILL

Dated 19 April 2023

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1. INTRODUCTION

1.1 My full name is Carolyn Joy Hill and I am a heritage consultant at Lifescapes.

1.2 My qualifications and experience were set out in my Statement of Evidence dated 24 March 2023. I repeat the confirmation in my Statement of Evidence that I have read and agree to comply with the Code of Conduct for Expert Witnesses.

1.3 In this rebuttal statement of evidence, I respond to late submissions 80 – 107 that were made in response to proposed changes to character clusters.

1.4 I note that two further submissions (9 and 10) were received in relation to character matters. These submissions supported the Kāinga Ora submission. As such, I address these matters in response to Kāinga Ora later in this rebuttal evidence.

1.5 I also respond to the evidence of:

- (a) Jared Milbank and Lorna Mitchell in support of submission 96;
- (b) Barbara and Rodney Ross in support of submissions 106 and 107;
- (c) Carolyn McAlley on behalf of Heritage New Zealand Pouhere Taonga;
- (d) Nicola Williams on behalf of RVA / Ryman;
- (e) Gurvinderpal Singh on behalf of Kāinga Ora;
- (f) Cameron Wallace on behalf of Kāinga Ora; and
- (g) Michael Campbell on behalf of Kāinga Ora.

1.6 The fact that this rebuttal statement does not respond to every matter raised in the evidence of a submitter within my area of expertise should not be taken as acceptance of the matters raised. I have focussed this rebuttal statement on the key points of difference that warrant a response.

2. RESPONSE TO LATE SUBMISSIONS 80 - 104

2.1 27 submitters lodged late submissions to Proposed Plan Change 26 (PC26), in response to information sent to them regarding proposed changes to character clusters and character streets as recommended in the Lifescapes Report. All submissions were accepted by the Hearing Panel in Direction #13.

2.2 A full tabulated response to each point raised by submitters is appended to this evidence (Appendix A).

2.3 In summary:

(a) 14 out of 27 submitters supported the character provisions of PC26, as described in the Section 42A report and its recommended tracked changes to the District Plan, contained in Appendix A of that report ("Section 42A report Appendix A").

(b) The remaining 13 submitters variously requested modifications to proposed character clusters.

2.4 I recommend the following changes to PC26 in response to these submissions. Refer to Appendix A for the full context of these recommendations.

Planning provisions

2.5 Several submitters raised issues related to PC26's lack of rules differentiating "character defining" and "non-character defining" sites

within character clusters. This issue was also raised by Kāinga Ora. Differentiating rules were originally recommended in the Lifescapes Report (section 8.4) and in my view these are useful for addressing submitters' concerns in this regard. For this reason I recommend the following changes to PC26's planning provisions.

2.6 Modify the MDRZ Activity Status Tables (2A.4.1) to create a distinction between "character defining" and "non-character defining" sites within a character cluster, in terms of applicable rules. My proposed changes are shown in **bold** below.

a) **Amend** Permitted activity 2A.4.1.1(f) as follows:

(f) Demolition and removal of buildings, except in ~~character clusters and~~ those listed in Appendix N1 - Heritage Items ~~and those on sites identified in a character cluster identified as "Character Defining" in a character cluster.~~

b) **Add a new Permitted activity** into 2A.4.1.1 (after q) –

(new) (r) "Within character clusters on sites identified as "Non-Character Defining," the construction of new buildings and alterations or additions to existing buildings, where the work undertaken is single storey and set back a minimum of 6m from road boundaries.

c) **Retain** Restricted Discretionary Activity 2A.4.1.3(d) as drafted in the Section 42A report Appendix A, i.e.

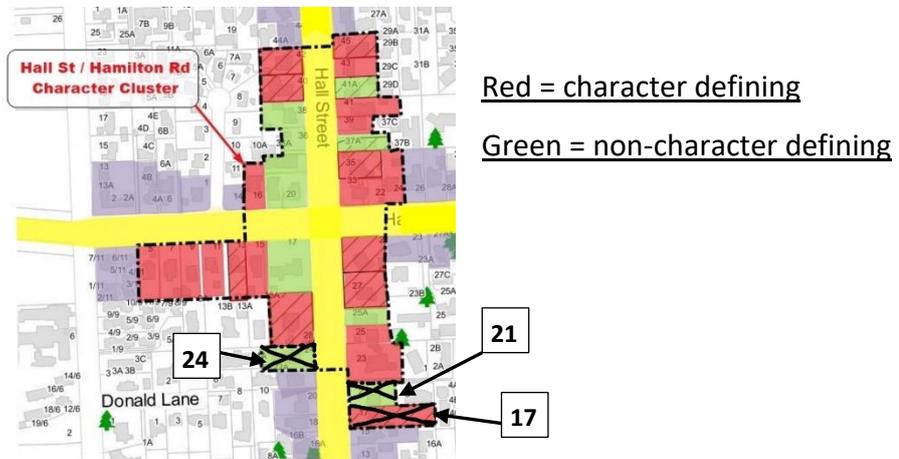
Character clusters sites (32.3) - Construction of new buildings, relocated buildings and demolition or removal or alterations or additions to existing buildings, except where permitted by 2A.4.1.1(q) and (r). (32.3)

Site-specific modifications

2.7 Several submitters requested that their property either be removed from an identified character cluster, or redefined from a "character defining" to a "non-character defining" site. I have responded to each of these submissions in Appendix A. In most cases I recommend no change to the site-specific identifications set out in the Section 42A report Appendix A,

due to the assessment process documented in the Lifescapes Report. However, in the cases below, I do consider that changes are appropriate due to these sites' particular characteristics in relation to the character cluster they are a part of.

- 2.8 Delete 17, 21 and 24 Hall Street from the Hall St / Hamilton Rd character cluster. Re-draw the Character Cluster Statement map (DG1) accordingly.



Summary of reasoning (see Appendix A for full explanation): These sites are located at the far southern end of the cluster. Property owners at 17 and 24 Hall Street wish to be removed from the cluster. Discontinuing the cluster to the north of these properties as shown above (i.e. removing these furthestmost properties) is a reasonable end point in light of the non-character defining status of 21 and 24, and the dividing line of Brock Place (north of no. 21).

- 2.9 Redefine 1030 Bank Street from a “Character Defining” to a “Non-Character Defining” site. Re-draw the Bank Street Character Cluster Statement map (DG1) accordingly.

Summary of reasoning (see Appendix A for full explanation): While 1030 Bank Street contribute to the historical legibility of the Bank Street character cluster, it is a 1950s housing typology rather than the early 20th century historical thematic focus of the Bank Street Character Cluster Statement (DG1). It is therefore considered appropriate to redefine this site to “Non-Character Defining.”

3. REPONSE TO JARED MILBANK AND LORNA MITCHELL

- 3.1 Jared Milbank and Lorna Mitchell provided evidence in support of their submission 96, relating to the Queen St character cluster in Cambridge. They do not support this cluster as identified in the Section 42A report Appendix A and associated planning maps.
- 3.2 At paragraph 4.1, Mr Milbank and Ms Mitchell make a factual error, stating that text clauses “DG1.1.5,” “DG1.1.6” and “DG1.1.7” come from the Lifescapes Report. To clarify, the text they quote does not exist in the Lifescapes Report. It does exist in the Operative Waipā District Plan, but this has been superseded by the proposed DG1 text included in the Section 42A report Appendix A. As such, this text is no longer a relevant consideration regarding PC26.
- 3.3 At paragraphs 4.2 – 4.8, Mr Milbank and Ms Mitchell dispute the inclusions of sites within the Queen Street character cluster. In response, I continue to be of the opinion that these properties are correctly identified as being (1) appropriately included in the character cluster and (2) appropriately identified as either character defining or non-character defining, as detailed in the Lifescapes Report assessment and recommendations.
- 3.4 At paragraph 5, Mr Milbank and Ms Mitchell include a section from the “Character Area Review for Waipā District Council” prepared by Paua Architects Ltd and included as Appendix 4 to the original notified version of PC26. This has been superseded by the Lifescapes Report and has not been taken forward in the Section 42A report Appendix A.

4. RESPONSE TO BARBARA AND RODNEY ROSS

- 4.1 Barbara and Rodney Ross provided evidence in support of their submissions 106 and 107, relating to the Rewi St and Bank St character clusters in Te Awamutu. They do not support these clusters as identified

in the Section 42A report Appendix A and associated planning maps and seek removal of all character clusters from PC26.

- 4.2 Mr and Ms Ross raise various matters regarding the identification of the Rewi Street character cluster, including developments in the neighbourhood over time and stylistic differences between houses. While I acknowledge these changes and differences, in my opinion this does not negate the value of these character clusters, as analysed in the Lifescapes Report.
- 4.3 Mr and Ms Ross raise concerns regarding a burden of being in a character cluster. I acknowledge these concerns and consider that the additional / modified provisions related to permitted activities, character defining / non-character defining properties, and matters for discretion (at paragraphs 2.6, 9.7 and 9.8) assist in alleviating these perceived issues.
- 4.4 Mr and Ms Ross raise the need to enable urban intensification in proximity to the town centre. In my view, identifying discrete areas of character within the new MDRZ, as set out in the Section 42A report Appendix A, appropriately balances intensification needs with maintaining historic character qualities that are part of the distinct identities of Waipā towns.
- 4.5 Mr and Ms Ross support Kāinga Ora's primary submission regarding full removal of character clusters. I note that Kāinga Ora's position has changed following the recommendations of the Lifescapes Report. This is discussed from paragraph 7 below.

5. RESPONSE TO CAROLYN MCALLEY, HERITAGE NEW ZEALAND

- 5.1 I concur with Ms McAlley that it is appropriate to consider potential adverse effects on adjacent historic heritage when assessing restricted discretionary development proposals in the Medium Density Residential Zone (MDRZ) (i.e. development beyond that permitted under the MDRS).

5.2 I therefore concur with her recommendation that rule 21.1.2A.6 Building height, assessment criteria (c) and (d) should remain as drafted in the Section 42A report Appendix A.

6. RESPONSE TO NICOLA WILLIAMS, RVA / RYMAN

6.1 Ms Williams considers that there is inadequate justification under the Resource Management Act s32 for character clusters to be qualifying matters (Williams evidence Section 2A, p. 36), and that character clusters undermine the intent of the MDRS (Williams evidence “Planning Maps”, p. 64).

6.2 I do not agree with this assessment, for the reasons laid out in my primary evidence (paragraphs 7.7 – 7.12) and as detailed in the Lifescapes Report (Section 2.2).

6.3 I therefore recommend that the provisions for character clusters remain as drafted in the Section 42A report Appendix A, with minor modifications as noted in my primary evidence (paragraphs 11.1 – 11.16) and further detailed in this rebuttal.

7. RESPONSE TO GURVINDERPAL SINGH, KĀINGA ORA

7.1 I note that Kāinga Ora accepts at a high level the modified character clusters as set out in the Lifescapes Report and adopted in the Section 42A report and does not dispute their extent / boundaries (Singh evidence paragraphs 5.1(c) and 9.2).

7.2 Mr Singh discusses the modified application of character clusters and character streets (Singh evidence paragraphs 9.1 – 9.7). The points he raises are reiterated in the evidence of Mr Wallace and Mr Campbell, and are therefore addressed in response to their evidence, below.

8. RESPONSE TO CAMERON WALLACE, KĀINGA ORA

8.1 Mr Wallace addresses PC26's amendments to the MDRS, including character clusters and character streets. I address these matters as they pertain to character clusters and character streets, below.

Character clusters

8.2 Mr Wallace raises various matters regarding character clusters in his evidence at paragraphs 6.1 – 6.5. My response below focuses on key points that warrant a response.

8.3 Mr Wallace considers the lack of differentiation between character defining and non-character defining sites overly onerous (Wallace evidence paragraph 6.4(a)). I note that Mr Campbell agrees with this position.

8.4 In my opinion, Mr Wallace's concerns are addressed by including differentiating rules for character defining / non-character defining sites. I therefore recommend modifications to the MDRZ Activity Status Tables (2A.4.1), as laid out at paragraph 2.6 above.

8.5 Mr Wallace considers that "the wording and intent of the character statements within DG1, are such that any intensification or redevelopment of more than a single-storey, detached dwelling would, in my opinion, find it difficult to gain resource consent no matter how sympathetically designed," And that "there appears to have been no consideration of including Character Clusters within the District Plan alongside a provision for greater intensification subject to design review via a resource consent process." (Wallace evidence paragraphs 6.4(d) and (e)).

8.6 I disagree with this assessment. As Mr Wallace states elsewhere (Wallace evidence paragraphs 6.9 - 6.10), the character statements contained in DG1 are not design guidelines but explanations of the historical values

and visual and physical characteristics of each character cluster. Their purpose is to inform future change, which is enabled as a restricted discretionary activity, with consideration given to proposed building bulk and design, materials, layout and form, and effects on existing character as described in DG1 (2A.4.1.3(d), also 21.1.2.5).

- 8.7 In my view, this is an appropriate balance between allowing for intensification as required by the Amendment Act and maintaining discrete clusters of historic character that are important to Waipā communities. However, I note that Mr Campbell's evidence provides modified wording for 2A.4.1.3(d) and 21.1.2.5 that provides further differentiation between character defining and non-character defining sites. I do not disagree with these modifications, and recommend their adoption at paragraph 9.8 below.
- 8.8 Mr Wallace considers that "there would be merit in amending the front yard building setback standard within Character Clusters on both character defining and non-character defining sites," establishing a 3m setback and a planting requirement.
- 8.9 In response, I note that there is currently no front yard building setback standard for character clusters. Rather, the restricted discretionary assessment criteria for new / relocated buildings, additions or alterations within character clusters (21.1.2A.4) assesses the (aa) "*extent to which new buildings and relocated buildings are avoided between an existing dwelling and the front boundary of a site,*" and (a) "*the extent to which the scale, height, bulk form, design, building materials, and **layout and position** of any buildings or additions is similar to the existing character of the cluster*" (my emphasis). Permitted activities are limited to rear modifications or (in the case of non-character defining sites) with a 6m setback (2A.4.1.1 (q) and proposed (r) – see paragraph 2.6b) above).
- 8.10 As such, in my opinion a 3m setback standard is not warranted. I therefore recommend no change to the Section 42A report Appendix A

in this regard. However, I do make further comment on this matter regarding a potential High Density Residential Zone; see paragraphs 8.22(b) - 8.23 below.

- 8.11 Mr Wallace points out that the Section 42A report Appendix A makes two references to DG1 as “design guidelines,” both in reference to “Infrastructure, Hazards, Development and Subdivision” restricted discretionary activities (15.4.1.1(e) and 21.1.15.6(u)). Mr Wallace recommends that 21.1.15.6(u) is deleted. It is noted that 15.4.1.1(e) and 21.1.15.6(u) also refer to the (commercial) Character Precinct Areas and their associated design guidelines DG2 – DG6.
- 8.12 As noted above (paragraph 8.6), Mr Wallace and I are in agreeance that the character statements in DG1 are not design guidelines. Furthermore, I do not consider that subdivision, in and of itself, needs to be considered in terms of potential effects on existing character as set out in the character statements (as any following new construction *will* be considered in light of DG1).
- 8.13 As such, I agree with Mr Wallace insofar that it would be appropriate to delete reference to “Character Cluster Areas” and “DG1” in 15.4.1.1(e) and 21.1.15.6(u). I do not have an opinion on the Character Precinct Areas and their associated Design Guidelines DG2 – DG6, as this is outside of the scope of my assessment.

Character streets

- 8.14 Mr Wallace notes that there are three character streets proposed to be retained; Hall Street, Hamilton Road and College Street. As described in my primary evidence (paragraph 11.11), this is incorrect, due to a mapping error that has caused Victoria Street to be inadvertently left off Map 58A. To reiterate from my primary evidence, the proposed retained character streets are Hall Street, Hamilton Road and Victoria Street in Cambridge, and College Street in Te Awamutu.

- 8.15 Mr Wallace discusses the retained character streets (Wallace evidence paragraphs 6.19 – 6.23, also 5.12) and concludes that the MDRS 1.5m setback is adequate and that the 6m setback rule (2A.4.2.6(b)) should be deleted. I note that Mr Campbell agrees with this position.
- 8.16 I disagree with this assessment. In particular, I note in his evidence that Mr Wallace compares the Waipā situation with a street in London, Highbury New Park, which he suggests “provides an example of where buildings up to five stories high exist in close proximity to the street boundary” (Wallace evidence paragraph 6.21, figure copied below).



Figure 1: Highbury New Park, as shown in Mr Wallace's evidence (and viewable on Google Maps).

- 8.17 As evidenced by the measurements on the map below (Figure 2), it is clear that the buildings along Highbury New Park exceed the 6m setback proposed for Waipā's remaining four character streets, with the minimum building setback in the above image being >7m. While this is a singular example, it demonstrates the importance of the 6m setback both from a visual perspective and also from a tree health and maintenance perspective. For example, construction work within rootzones, reverse sensitivity re leaf fall, etc. These are not minor issues and they have the potential to generate progressive loss of a distinctive character that

forms a key aspect of the history and identity of these towns, particularly Cambridge.

- 8.18 While the potential for physical adverse effects do vary across the identified character streets (Victoria Street, for example, has its tree avenue in the centre of the road), their collective character qualities are easily compromised by incremental change, particularly at front boundaries at the scale enabled by the MDRS.



Figure 2: Setback measurements on Highbury New Park, London.

- 8.19 I agree in principle with Mr Wallace that future, higher built form along character streets may frame long vistas, and that these streets' high natural amenity make them suitable for higher development density (Wallace evidence paragraph 6.22). However, as evidenced in Figure 1 and Figure 2, it is clear that a 6m setback is required to support the

achievement of these aims while enabling character qualities to be maintained.

- 8.20 The character streets have been subject to site-specific assessment per the Lifescapes Report, with the result that the character street control has been limited to four streets. This is, in my view, an appropriate balance between allowing for intensification as required by the Amendment Act and maintaining very particular streetscapes that are important to Waipā communities.

Kāinga Ora-proposed High Density Residential Zone

- 8.21 Mr Wallace discusses the rationale for a High Density Residential Zone (HDRZ) within an approximate 400m walking catchment from the Cambridge town centre (Wallace evidence paragraphs 7.1 – 7.15). I note that some of the residential areas proposed for HDRZ by Kāinga Ora overlap with character clusters, as well as encompassing a range of scheduled historic heritage places.
- 8.22 Should a HDRZ be established as part of this plan change process, I agree with Mr Wallace that amendments to the HDRZ would be warranted to help address the interface with historic heritage places and character clusters. If a HDRZ is established, I would support the following additional changes:
- (a) I endorse Mr Wallace's recommendations (Wallace evidence paragraphs 7.14(a), (c) and (d)) for a height in relation to boundary control, a reduction in building coverage, and inclusion of an additional matter of discretion relating to the interface with historic heritage and character clusters.
 - (b) I also agree that a front yard building setback standard should be established for HDRZ sites within identified character clusters (Wallace evidence paragraph 7.14(b)), should a HDRZ be

established. However, in my view this setback standard should be 6m, not 3m as proposed by Mr Wallace. This is commensurate with the historical values and visual and physical characteristics of character clusters as set out in DG1 and would appropriately balance intensification needs with retaining character qualities that have historical value for Waipā communities.

- 8.23 I note that, should a HDRZ be established, further work may be required to ensure HDRZ provisions appropriately align with ongoing retention of historic heritage, character clusters and character streets.
- 8.24 I note that Mr Wallace and Mr Campbell both address commercial zones, including matters of character precincts in town centres. I do not address these matters, as they are outside of the scope of my assessment.
- 8.25 I note that Mr Wallace is supportive of Mr Campbell's proposed amendments to the Section 42A report Appendix A. These are discussed below.

9. RESPONSE TO MICHAEL CAMPBELL, KĀINGA ORA

- 9.1 Mr Campbell addresses various matters related to character clusters and character streets, and proposes modifications to the plan change text provided in the Section 42A report Appendix A. My response below focuses on key points that I have not already addressed in response to Mr Wallace, above.
- 9.2 Mr Campbell (evidence paragraph 8.16) does not support proposed amendments to permitted activity 2A.4.1.1(b) "Up to three dwellings per site... outside of identified character clusters." He suggests that this effectively precludes up to three dwellings per site.
- 9.3 I disagree with this assessment. 2A.4.1.1(b) does not preclude substantial site development, but simply ensures that any such development is

assessed as a restricted discretionary activity, rather than permitted as of right.

9.4 I consider this an appropriate response to a qualifying matter that has been established through site-specific assessment as required by the Amendment Act s77L. As such, I recommend no change to the Section 42A report Appendix A in this regard.

9.5 Mr Campbell (evidence paragraph 8.16) also does not support permitted activity 2A.4.1.1(q): “Within character clusters, the construction of new buildings and alterations or additions to existing buildings, where the work undertaken is single storey and parallel to and facing the rear boundary of the site.” Mr Campbell considers that *“the wording of 2A.4.1.1(q) is confusing, and appears to suggest that new buildings could be constructed in a character cluster provided it is facing the rear boundary.”*

9.6 I disagree that 2A.4.1.1(q) is confusing; rather, in my view it creates an important enablement for property owners wishing to build an additional home or undertake an addition or alteration as a permitted activity, subject to development being single storey and at the rear of the site. I also disagree with Mr Campbell’s suggestion (evidence paragraph 8.17) that (q) *“forecloses opportunities for meaningful intensification”* and *“risks poor design outcomes.”* Rather, it appropriately provides for a level of intensification as of right within character clusters, with further development being enabled as a restricted discretionary activity.

9.7 I do, however, agree that the wording of 2A.4.1.1(q) could be simplified slightly, as follows (my proposed changes are shown in **bold**):

2A.4.1.1(q) Within character clusters, the construction of new buildings and alterations or additions to existing buildings, where the work undertaken is single storey and **parallel to and facing the rear boundary of the site. located at the rear of the site.**

- 9.8 I therefore make the following recommendations in response to Kāinga Ora’s proposed amendments to Section 2A – Medium Density Residential Zone, included in Mr Campbell’s evidence at 2.3. Kāinga Ora’s proposed changes are in red,¹ and my response follows below:

Qualifying Matters - Introduction

2A.1.9 (i) Where there are specific matters which make higher density inappropriate such as protected trees, character defining sites within character clusters and specific requirements applying within Structure Plans.

My recommendation: **Reject** inserted text. Character clusters should be collectively understood and assessed accordingly, and areas that have been identified as character clusters have site-specific characteristics that make intensification to the level enabled by the MDRS inappropriate, as detailed in the Lifescapes Report.

(Regarding character streets) 2A.1.22 – [additional sentence] / 2A.1.23 – [deletion]

My recommendation: **Reject** changes. As discussed in paragraphs 8.15 - 8.20 and as analysed in the Lifescapes Report, it is my view that character streets, and their 6m setback rule, should be retained.

2A.2.3 There are clusters of existing dwellings in the District that have a special character comprised of character defining and non-character defining sites. New developments, relocated buildings and subdivisions have the potential to detract from the character of these clusters.

My recommendation: **Reject** inserted text. Clusters collectively have special character, and the fact that some sites within them have been defined as “non-character defining” does not mean that they do not contribute to the collective legibility and coherence of the cluster.

2A.3.3.1 To maintain and where appropriate enhance Cambridge’s character by:

¹ Where I have [bracketed] the text, the Kāinga Ora text is summarised only – for brevity.

(e) Maintaining the mix of villas, bungalows and other early – mid-20th century housing **types** within **the** identified character clusters, while providing for intensification opportunities on non-character defining sites in a manner sympathetic and complementary to identified character values;

~~(g) Maintaining existing setbacks along identified character streets to maintain the visual dominance of tree avenues.~~

My recommendation:

Accept inserted text at (e).² Intensification opportunities are enabled in character clusters by the permitted activities / restricted discretionary activities pathways, and it is appropriate to signal this at a policy level.

Reject deleted text at (g). As discussed in paragraphs 8.15 - 8.20 and as analysed in the Lifescapes Report, it is my view that character streets, and their 6m setback rule, should be retained.

2A.3.3.3 To maintain and where appropriate enhance Te Awamutu's character by:

(d) Maintaining the mix of villas, bungalows and other early – mid-20th century housing types within identified character clusters, while providing for intensification opportunities on non-character defining sites in a manner sympathetic and complementary to identified character values;

~~(f) Maintaining existing setbacks along identified character streets to maintain the visual dominance of tree avenues.~~

My recommendation: **Accept** inserted text at (d); **reject** deleted text at (f), for the same reasons as outlined above.

2A.3.3.4 To maintain and enhance the identified character of each character cluster by:

(a) Avoiding new buildings and relocated buildings between the dwelling and the front boundary of a site on character defining sites; and

(b) For new buildings or relocated buildings on character defining sites, maintaining a similar scale, height, bulk, form, building materials, layout and position to other dwellings within the cluster;

My recommendation: **Reject** inserted text at (a) and (b). In my view this policy applies to all sites within a cluster, as it is for these collective

² I note a missing word 'types' and an unnecessary 'the' – this should be amended per my blue text, and as per the Te Awamutu case following.

values that clusters have been identified. Differentiation between “character defining” and “non-character defining” appropriately sits in the rules.

Policy - Building setback: character street landscaping
 2A.3.4.2 To maintain the ~~existing~~ character of identified character streets ~~by ensuring that building setbacks from the road are landscaped with a mixture of trees, shrubs and ground cover plants or grass.~~³ ~~by having a consistent minimum building setback.~~

My recommendation: **Reject** changes, including in the policy title and at 2A.3.4.2. As one exception, I agree that the word “existing” could appropriately be removed.

In my view, landscaping requirements are largely unenforceable, and it is the setback that is the key aspect in maintaining experiential character.

2A.4.1.1 Permitted Activities

(b) Up to three dwellings per site ~~outside of the Infrastructure Constraint Qualifying Matter Overlay and outside of identified character clusters.~~ not including identified character defining sites within character clusters.

My recommendation: **Reject** changes.⁴ As analysed in the Lifescapes Report, three dwellings per site as of right is an inappropriate outcome in a character cluster, regardless of whether a particular site is character defining or non-character defining. This is the reason ‘clusters’ are identified, rather than ‘spot-zoning’ of individual sites. However, such development does have a pathway as a restricted discretionary activity as previously discussed.

2A.4.1.1 Permitted Activities

(f) Demolition and removal of buildings, except in character clusters and those listed in Appendix N1 - Heritage Items and those on sites identified in a character cluster ~~identified as ‘non-character defining’.~~

³ I note some inserted Kāinga Ora text is not red in Mr Campbell’s evidence.

⁴ I note my rejection relates to character matters only; I have no opinion on the Infrastructure Constraint Qualifying Matter Overlay.

My recommendation: I **agree** with this addition. However, in my view, my wording (at paragraph 2.6a) above) is clearer, and should be the adopted version.

2A.4.1.1 Permitted Activities

~~(q) Within character clusters, the construction of new buildings and alterations or additions to existing buildings, where the work undertaken is single storey and parallel to and facing the rear boundary of the site.~~

My recommendation: **Reject** deletion. This activity status appropriately enables a level of intensification as a permitted activity within character clusters. This permitted activity existed in the previous Residential Zone and should continue to apply under the MDRZ. I do, however, consider that the wording of 2A.4.1.1(q) could be simplified slightly, and therefore recommend it be modified as set out in paragraph 9.7 above. I also note my recommendation for a further permitted activity (r), as set out in paragraph 2.6b) above.

2A.4.1.3 Restricted Discretionary Activities

Character clusters sites - Construction of new buildings, relocated buildings and demolition or removal or alterations or additions to existing buildings, except where permitted by 2A.4.1.1 ~~(f), (q) and (r)~~.

My recommendation: **Accept** insertion of (f), **reject** deletion of (q) and (r).
As discussed above.

Also under 2A.4.1.3, Kāinga Ora sets out new / modified matters for restricted discretion. In particular, they differentiate between character defining and non-character defining sites. I do not disagree with these changes.

My recommendation: **Accept** modifications to matters for discretion.

2A.4.2.6 Minimum building setback depth

(b) On sites within a character cluster area with frontage to adjoining a road where the Character Street policy overlay applies, a front yard setback of 6 3 metres is required. The front yard (excluding vehicular and pedestrian access points) along Character Streets

must be planted with a mixture of trees, shrubs and ground cover plants or grass.⁵

My recommendation: **Reject** changes. In my view the 6m setback should be retained for identified character streets.

2A.4.2.(xx) On sites adjoining a road where the Character Street landscaping control applies, the front yard setback required under 2A.4.2.4 (excluding vehicular and pedestrian access points) must be planted with a mixture of trees, shrubs and ground cover plants or grass.

My recommendation: **Reject** this proposed new rule.

MDRZ Assessment criteria: Restricted Discretionary Activities:
21.1.2A.4 Character clusters - Construction of new buildings, relocated buildings, and removal or demolition of or alterations or additions to existing buildings
(aa) The extent to which new buildings and relocated buildings are avoided between an existing dwelling and the front boundary of an identified character-defining site.

My recommendation: **Reject** inserted text. This assessment criteria should apply to all sites within an identified cluster.

Also under 21.1.2A.4, Kāinga Ora sets out new / modified assessment criteria. In particular, they differentiate between character defining and non-character defining sites. I do not disagree with these changes.

My recommendation: **Accept** modifications to assessment criteria.

MDRZ Assessment criteria: Restricted Discretionary Activities:
21.1.2A.8 Setbacks
(a) The extent to which the road boundary setback is appropriate in the location, particularly where located ~~adjoining in~~ a Character Street Cluster.

My recommendation: **Modify** text as below:

(a) The extent to which the road boundary setback is appropriate in the location, particularly where located ~~adjoining-on~~ a Character Street or within a Character Cluster.

⁵ I note some inserted Kāinga Ora text is not red in Mr Campbell's evidence.

MDRZ Assessment criteria: Restricted Discretionary Activities:

21.1.2A.8 Setbacks

(k) The extent to which development ~~is compatible and~~ does not detract from, ~~but is sympathetic and responsive to~~, the values of adjacent historic heritage or character cluster sites.

My recommendation: **Accept** changes to text.

Appendix DG1 Character Cluster Statements

Kāinga Ora proposes to delete the sentence, “Modern developments within the cluster are largely sympathetic to the established historical character in form, scale, setback and materiality” which occurs at the end of each statement.

My recommendation: **Reject** deletions. As discussed at paragraph 8.6, the character statements contained in DG1 are not design guidelines but explanations of the historical values and visual and physical characteristics of each character cluster. The sentence above confirms the findings of the required site-specific analysis that has occurred in these areas and provides context for the inclusion of non-character defining sites within the cluster and their contribution to the cluster as a cohesive whole.

Carolyn Hill
19 April 2023

Appendix A

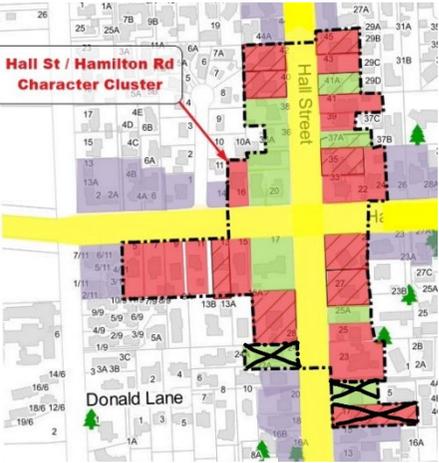
RESPONSE TO PC 26 LATE SUBMISSIONS AND FURTHER SUBMISSIONS ON MATTERS OF HISTORIC HERITAGE AND CHARACTER

Sub #	Submitter Name	Position	Plan Ref.	Summary of submission	Decision requested	Response
80	Phillips, Terence	Support	2A.4.1 21.1.2A Appendix DG1	Fully support the change and classification of 'character cluster' as we need to retain the history and character of residential areas.	Support homeowners in seeking classification where applied.	Noted. This aligns with the recommendations of the s42A report, as shown in the amended planning maps and Appendix DG1.
81	Wiles, James	Support	2A.4.1 21.1.2A Appendix DG1	Support as there are great houses around and would not like to see the character of the street spoiled by haphazard building of 3 storied apartments.	Confirmation of inclusion of 73 Princes Street in a Princes Street Character Cluster.	Noted. See response to Submission 80.
82	Bleskie, Oliver	Oppose	2A.4.1 21.1.2A Appendix DG1	Urban sprawl unnecessary use of green areas. The original quarter-acre character of 1050 Bank St lost long ago and the street now a motley collection of different styles. TA is in need of more residential dwellings in and around the town centre and Bank St intensification will enable people to walk and cycle, rather than drive.	Residential zone intensification should be implemented for Bank St. Character clusters should be limited strictly to areas where the original style and land use have been preserved in their entirety, unlike Bank St.	Reject. Bank Street has developed incrementally over time and contains a notable cluster of early – mid 20 th century residences that collectively meet the criteria for inclusion as a character cluster in the District Plan. Rear subdivisions with single storey standalone houses have had minimal detrimental impact on the historic legibility of the street. With regard to intensification, it is noted that the Amendment Act specifically includes the opportunity for territorial authorities to limit development where justified by site-specific analysis, via the “other matter” qualifying matter at s77I(j). It is therefore considered appropriate to use this tool where site-specific analysis warrants it, given the contribution character clusters make

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						to people and communities' social and cultural wellbeing as part of well-functioning urban environments. It is noted that the potential gain in housing supply by removing this qualifying matter would be minimal, given the relatively small number of sites affected.
83	Bland, Michael and Janet	Support	2A.4.1 21.1.2A Appendix DG1	Endorse Hall St being added to the cluster.	Add Hall Street to the cluster.	Noted. See response to Submission 80.
84	Williamson, Glenn & Shelley	Oppose	2A.4.1 21.1.2A Appendix DG1	Do not want to see heritage homes removed and sections being made small to accommodate multiple homes. Character homes are what makes our area special and desirable.	Preserve character homes	<p>A key objective (4) of the NPS-UD is that "New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations." In its policy (6), it requires policy-makers to have particular regard to RMA planning documents that may "involve significant changes to an area, and those changes: (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and (ii) are not, of themselves, an adverse effect."</p> <p>The RMA-EHS gives legal effect to this the NPS-UD directive and Waipā District Council has promulgated PC 26 as required by this Act.</p> <p>The PC 26 approach has been to enable MDRS, with qualifying matters identified in accordance with the Amendment Act s771.</p> <p>Scheduled heritage places (individual properties) and character clusters (discrete property groupings) are included as qualifying matters, meaning that intensification is restricted and managed on these sites.</p>

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						<p>Character streets are another important site-specific qualifier that facilitate sustainment of historic streetscapes that Cambridge in particular is well known for and that have been noted by submitters.</p> <p>It is considered that PC 26's approach appropriately gives effect to the RMA-EHS, and balances the needful requirements of MDRS with retention of historic places that give Waipā's towns their individual identity.</p> <p>In my view, the character cluster coverage recommended in the Lifescapes report responds appropriately to the decision sought by this submitter.</p> <p>Recommendation: - Accept the recommended modifications to PC 26 as set out in the s42A Report, with regard to the extent and coverage of character clusters.</p>
85	Whittle, Annette	Support	2A.4.1 21.1.2A Appendix DG1	Replacing Heritage with high density housing will ruin the look of the area	Retain character of town.	Noted. See response to Submissions 80 and 84.
86	Gow, Steve	Oppose	2A.4.1 21.1.2A Appendix DG1	House at 76 Princes Street, Cambridge is only partially visible from the road and 1950's brick - no architectural or heritage character merit - Removes future financial benefits if included in cluster.	Property not included in character cluster.	<p>Reject. 76 Princes Street has been identified as a non-character defining site within the character cluster, as shown in DG1, due to its substantial setback and lack of visibility of the house from the street. However, the site makes a significant contribution to the coherence and character of the collective streetscape as identified in the Character Cluster Statement.</p> <p>As set out in the Lifescapes criteria for assessment of character clusters, it is anticipated that a cluster will contain modern developments as well as</p>

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						<p>historically-derived houses. It is important for these sites to be included such that future development within the identified cluster is managed taking into account the character values of the cluster as a whole.</p> <p>It is noted that the activity status rules provide scope for certain development activities as a permitted activity (2A.4.1.1(q)), and development that does require RD consent considers “the visibility of the new building and/or alterations or additions from public places” (2A.4.1.3(d)).</p> <p>Regarding financial benefit or otherwise, I note that this is outside my area of expertise. However, research on price premium for properties within designated character areas may be of interest: David Bade, Jose Gabriel Castillo, Mario Andres Fernandez, and Joseph Aguilar-Bohorquez, “The Price Premium of Heritage in the Housing Market: Evidence From Auckland, New Zealand,” <i>Land Use Policy</i>, 99, (2020): 3, 12.</p>
87	Gainsford, Jennifer	Support	2A.4.1 21.1.2A Appendix DG1	Support property at 94 Princes Street, Cambridge being included in cluster.	Support and protect heritage housing within the district	Noted. See response to Submission 80.
88	Campbell, Graeme and Lucy	Support in part	2A.4.1 21.1.2A Appendix DG1	We do not think being included in the Character Cluster is in our best interests personally, and financially. Would hinder our enjoyment of the property. Would result in financial detriment having to go through the Resource Consent process for any alterations/upgrades. Potential development in the area will cause costly challenges.	If Council are not able to reconcile issues raised – wish 17 Hall Street, Cambridge to be removed from Cluster.	<p><u>NOTE: The discussion below is a combined response to Submissions 88 and 99 (following), due to their related location and requests.</u></p> <p>The property owners at 17 Hall Street (this Submission 88) and at 24 Hall Street (Submission 99) both request to be removed from the character cluster.</p> <p>17 Hall Street sits at the far south-eastern end of the Hall St / Hamilton Rd Character Cluster, as shown in Planning Map 58A. Along with no. 21, it</p>

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						<p>extends beyond the character cluster coverage on the western side of Hall Street. No. 17 is a notable example of the transitional English Bungalow architectural style, and it is considered appropriate to include this site in the cluster.</p> <p>24 Hall Street is also at the far southern end of the character cluster, but on the western side of the street. It is noted that no. 24 is a non-character defining property, although the property is sympathetic to the established historical character in form, scale, setback and materiality as noted in the Character Cluster Statement in DG1. It is considered appropriate to include this site in the cluster for the cluster's overall historical legibility and continuity.</p> <p>However, an alternative approach would be to reduce the character cluster back to 28 / 23 Hall Street; i.e. delete no.'s 17, 21 and 24 from the cluster, as shown below:</p> 

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						<p>Discontinuing the cluster at no. 23 (east side) is a reasonable end point, given the dividing line of Brock Place on its southern boundary, and the fact that no. 17 is categorised as a non-character defining site. On the west side, discontinuing at no. 28 is also reasonable given that no. 24 is non-character defining.</p> <p>Recommendations: The following recommendation is made in light of the discussion above and in response to Submissions 88 and 99.</p> <ul style="list-style-type: none"> - Delete no. 17, 21 and 24 Hall Street from the Hall St / Hamilton Rd character cluster. Recolour-code the Character Cluster Statement map (DG1) accordingly. <p>It is noted that the Character Street 6m setback rule would continue to apply along this length of street.</p>
89	Dalziel, Christine	Oppose	2A.4.1 21.1.2A Appendix DG1	Strongly object to intensification and 'character cluster' areas	Lack of consultation as part of the assessment process; impact on properties included within a character cluster area in terms of value; there is no 'character cluster' within the area.	Reject. See response to Submission 84.
90	Trower, Jason	Support in part	2A.4.1 21.1.2A Appendix DG1	Concern that the character clusters will be surrounded by 3 story houses which will detract from the heritage environment.	Make large heritage zones or don't make any at all.	Noted. It is considered that the identification of a substantial character cluster at Hall St / Hamilton Rd, plus the inclusion of both Hall Street and Hamilton Road as character streets, appropriately addresses this point.
91	Marsh, Nicolas	Support	2A.4.1 21.1.2A Appendix DG1	Approves his property at 74 Princes Street, Cambridge being included in Character Cluster.	Leave property in the Character Cluster.	Noted. See response to Submission 80.

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				Leave property in the Character Cluster.		
92	Twine, Wendy & Peter	Support	2A.4.1 21.1.2A Appendix DG1	Approves his property at 59 Princes Street, Cambridge being included in Character Cluster.	Support PC26.	Noted. See response to Submission 80, and to Submission 51 (points 51.2 – 51.6, Appendix A of the Lifescapes report) to which this submitter refers.
93	Amundsen, Elizabeth	Support	2A.4.1 21.1.2A Appendix DG1	The visual and physical characteristics of the houses in this cluster make them worth historical value – houses are over 100 years old.	Agree with decision to include property in Character Cluster.	Noted, with thanks for the historical information contained. See response to Submission 80.
94	Hislop, Murray & Coral	Support	2A.4.1 21.1.2A Appendix DG1	Supports creating Character Clusters to provide positive visual break from potential 3 storeyed dwellings.	Seeks approval of Bank St Character Cluster.	Noted. See response to Submission 80.
95	McKnight, Ruth	Support	2A.4.1 21.1.2A Appendix DG1	Supports property at 37 Queen Street, Cambridge being included in character cluster - agrees with character clusters being a qualifying matter in the MDRS.	Supports changes proposed in Report	Noted. See response to Submission 80. This submitter's support of differentiation between non-character defining and character-defining sites is noted and commented on further in response to Submission 96, below.
96	Milbank, Jared and Mitchell, Lorna	Support in part	2A.4.1 21.1.2A Appendix DG1	Property at 35 Queen Street, Cambridge, a non-character home. Seeks changes to the proposed provisions - only expand character clusters to homes that explicitly agree to their inclusion; exclude non-character defining homes from the character clusters; if the expansion on the character cluster does take place, that regulations and considerations for changes to the non-character	Require explicit agreement, or acknowledgement from property owners for inclusion of their properties in a character cluster; reassess the extent of the Queen St character cluster based on full description of character intent, rather than just style of house, and recolour the map based on this; reassess the number and percentage of character defining properties based on the full description of a character	Accept in part. The property at 35 Queen Street is identified as a non-character defining site within the character cluster, as shown in DG1. While modern, the property is sympathetic to the established historical character in form, scale, setback and materiality as noted in the Character Cluster Statement in DG1. As set out in the Lifescapes criteria for assessment of character clusters, it is anticipated that a cluster will contain modern developments as well as historically-derived houses. It is important for

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				<p>defining houses in the cluster should be no more restrictive than the district plan regulations and considerations that existed prior to the expansion of the character cluster.</p>	<p>property, rather than just house style; remove non-character defining properties from the cluster; remove DG1.1.31; definitions to be updated to be based on angles, lighting and height limits and not on the number of storeys; provisions/regulations should not apply to non-character defining homes in a character cluster; remove all provisions that extend beyond the character cluster; feedback sought from property owners adjoining expanded character clusters that would be affected.</p>	<p>these sites to be included such that future development within the identified cluster is managed taking into account the character values of the cluster as a whole. As such, it is considered appropriate to retain this property in the Queen Street cluster.</p> <p>I also note comments above at Submission 82 regarding potential gain in housing supply by removing character clusters.</p> <p>The submitter also notes the lack of differentiation between non-character defining and character-defining sites, with regard to activity status rules, and the potential for this to create an undue consent application burden for non-character defining properties. While I note in my primary evidence that such differentiation may add unnecessary complexity, a number of submissions (including 95, 96, 101 and 103) indicate that a differentiated approach may provide greater certainty for property owners going forward.</p> <p>Recommendation: The following recommendations are therefore made in response to this submission:</p> <ul style="list-style-type: none"> - Retain 35 Queen Street as a non-character defining site within the Queen Street character cluster, as shown in DG1. - Modify the MDRZ Activity Status Table (2A.4.1) to create a distinction between “character defining” and “non-character defining” sites within a character cluster, in terms of applicable rules. This would enable greater permissiveness on sites with less character value while maintaining the character values and visual coherence of the cluster as a whole. In particular:

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						<p>(a) to enable buildings on non-character defining sites to be demolished as a permitted activity; and (b) to enable new construction on non-character defining sites as a permitted activity, subject to being single storey with a 6m minimum setback.</p> <p>Recommended text for this activity status modification is set out in the Lifescapes Report, 1 March 2023, Section 8.4.</p>
97	Chubb, Mark Re. 167 Victoria Street, Cambridge	Oppose	2A.4.1 21.1.2A Appendix DG1	PC26 will irreversibly impact the quaint town character environment that Cambridge has developed and become known for. The intensification of housing in Cambridge will dramatically impact the historic parts of the community, with character and heritage homes with larger sections being targeted for development. This will lead to neighbouring properties being devalued and likely bought out by further developers. Neighbouring houses will also be heavily impacted by the grandeur of these modern large scale developments, blocking light, tree growth (which Cambridge is known for) and putting further strain on services.	If proposed Plan Change 26: Residential Zone Intensification is to go ahead then the council must (at the very least) retain the current character cluster overlays of Cambridge, ensuring its history, character, and appeal is not lost.	<p>Accept in part. Proposed amendments to PC26 set out in the s42A report retain some sites previously identified as character clusters, delete others where there is no 'cluster' (only individual sites), and enlarge other clusters where this is justified by site-specific analysis. In my view, this has strengthened the district plan's response to matters of character as raised by this submitter.</p>
98	Cullen, Stephen	Support in part	2A.4.1 21.1.2A Appendix DG1	Need clarity on restrictions on alterations.	Clarity on extent of alterations - will consent be required for painting house or replacing roof?	<p>The intention of the character cluster tool is not to prevent repairs and maintenance, although it is noted that these activities are different from 'alterations'.</p> <p>It is noted that the track changed PC26 contained in the s42A report does not specifically include</p>

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						<p>“repairs and maintenance” as a permitted activity (2A.4.1.1 Activity Status Table).</p> <p>Recommendation: Consideration should be given to whether such a clarifying addition should be made. It is noted that such a clause need not relate specifically to character clusters.</p>
99	Baggot, Christina	Oppose	2A.4.1 21.1.2A Appendix DG1	Oppose as the cluster on this section of Hall St (at 24 Hall Street) comprise of newer properties with limited special character or kerb appeal. The additional planning rules associated with a character cluster will affect any improvements made to the property and will result in additional costs. There was also a lack of consultation time for people to prepare a submission.	24 Hall Street be removed from the character cluster as shown on Map 58A and significantly revise the rules around any proposed character clusters so they are not discriminatory towards those who have homes in the character cluster.	<p>Accept. See response to Submission 88.</p>
100	MacGillivray, James & Jennifer	Support	2A.4.1 21.1.2A Appendix DG1	We support our property being included in the proposed Thornton Rd East character cluster for the reasons set out in our previous full submission on the overall plan change.	Confirm the Thornton Rd East character cluster proposed in the Lifescapes Report.	<p>Noted. See response to Submission 80.</p>
101	Martin, Ailea and Street, Brett	Oppose	2A.4.1 21.1.2A Appendix DG1	Lack of time provided to make a submission; lack of consultation; removal of property rights; the house to the rear of the site is 'non-character defining' and it does not seem fair and reasonable for two properties on the same site to be defined differently; property sits between	Property at 1030 Bank Street, Te Awamutu is removed from the Bank St Character Cluster, or property removed as 'Character Defining'.	<p>Accept in part. The property at 1030 Bank Street is identified as a character defining site within the character cluster. The house and surrounds are an example of 1950s housing vernacular, and contribute to the historical legibility of Bank Street in terms of its incremental development over time.</p>

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				<p>2 smaller clusters of villas and bungalows and site has been included to join the clusters; as per the definition in the Lifescapes Report a character cluster should encompass both sides of the street; the rules are onerous and the requirement for resource consent increases cost and has the potential for notification; would not be permitted the same rights in terms of building consent exemptions. Support in part rule 2A.4.1.1(q).</p>		<p>However, it is noted that the historical themes represented by Bank Street focus on early 20th century architecture, including the box villa and English bungalow styles. This is described in the Bank Street Character Cluster Statement (DG1). The mid-century stucco house at 1030 Bank Street complements these styles but does not exemplify the cluster themes.</p> <p>It is therefore considered appropriate to redefine 1030 Bank Street from a “Character Defining” to a “Non-Character Defining” site, as proposed in this submission.</p> <p>It is also considered that creating a differentiation between “Character Defining” and “Non-Character Defining” sites (as laid out in response to Submission 96, above) would provide helpful clarity in response to concerns raised by this submitter. It is noted too that the submitter supports a single storey constraint.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Redefine 1030 Bank Street to a Non-Character Defining site. Recolour-code in Character Cluster Statement map (DG1) accordingly. - Incorporate provisions to differentiate “Character Defining” and “Non-Character Defining” (see Submission 96). <p>Further note: The submitter notes that Bank Street is an exception to the Lifescapes’ criteria that character clusters “should encompass both sides of the street unless there is sound historical or visual justification otherwise” (Lifescapes Report, 1 March 2023, Section 7.1). In the case of Bank Street, the justification for not including both sides is historical and visual – the land slopes in this area,</p>

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						meaning that the upper slopes typically were developed ahead of the slightly lower slope; and the slope creates a visual prominence of one side (sloping up from the street) vs the other that is set slightly lower than the street and is therefore less contributory as a row. This makes the Bank Street character cluster a justifiable exception to the “both sides of the street” criteria.
102	Hawkins, Eileen	Oppose	2A.4.1 21.1.2A Appendix DG1	Creates an issue of equity and places the burden of RC costs and time delays on those within the clusters; does not address the shortage of housing in NZ in locations close to town and with existing infrastructure; greater restrictions - house at 5 Bowen St is a corner site and therefore has two front yards.	Property at 5 Bowen St to be removed from the character cluster but if character cluster goes ahead then RC fees to be waived.	<p>Reject.</p> <p>The Thornton Rd / Princes St Character Cluster (including the property at 5 Bowen Street, along with neighbouring properties) has been identified as a character cluster following a rigorous methodology and site-specific assessment against criteria as set out in the Lifescapes Report. 5 Bowen Street is a character defining site with a notable example of the English Bungalow architectural style, and it is considered appropriate to include this site in the cluster. It is noted that this property was included as a character cluster in PC26 as notified (Planning Map 58).</p> <p>With regard to intensification, it is noted that the Amendment Act specifically includes the opportunity for territorial authorities to limit development where justified by site-specific analysis, via the “other matter” qualifying matter at s77I(j). It is therefore considered appropriate to use this tool where site-specific analysis warrants it, given the contribution character clusters make to people and communities’ social and cultural wellbeing as part of well-functioning urban environments. It is noted that the potential gain in housing supply by removing this qualifying matter would be minimal, given the relatively small number of sites affected.</p>

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						Note: RC fees waiver is beyond my scope and expertise. I defer to the specialist planner with regard to the submitter's request for RC fees waiver.
103	Martin, Vaughan	Oppose	2A.4.1 21.1.2A Appendix DG1	The dwelling at 1030B Bank St is not sympathetic to the surrounding character houses; future costs associated with the RC process; demolition is not a permitted activity and the provisions as noted in the Lifescapes Report around demolition of non-character defining buildings has been incorporated into the tracked changes of PC26; character cluster not defined; no peer review of the report prepared by Lifescapes.	Property at 1030B Bank St, Te Awamutu to be removed from the character cluster	<p>Reject. 1030B Bank Street is a non-character defining property within the Bank Street Character Cluster, and is located on a rear section. The residence is somewhat obscured from the street by the front property, and its siting and overall form and scale are sympathetic to the cluster as noted in the Character Cluster Statement in DG1.</p> <p>As set out in the Lifescapes criteria for assessment of character clusters, it is anticipated that a cluster will contain modern developments as well as historically-derived houses. It is important for these sites to be included such that future development within the identified cluster is managed taking into account the character values of the cluster as a whole.</p> <p>Furthermore, it is noted that the land slopes upwards from the street in this location, meaning that any substantial rear site development (particularly 2+ storeys) could potentially have significant adverse effects on the cluster's identified character values in terms of visual dominance. It is therefore considered appropriate to include this site (and other rear sites) in the cluster for the cluster's overall historical legibility and coherence.</p> <p>It is noted that the submitter does not disagree with the intent of the plan change. As with others, the submitter discusses the lack of differentiation between non-character defining and character-</p>

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						<p>defining sites (see response to Submission 96, above).</p> <p>Recommendation: The following recommendations are therefore made in response to this submission:</p> <ul style="list-style-type: none"> - Retain 1030B Bank Street as a non-character defining site within the Bank Street character cluster, as shown in DG1. - Modify the MDRZ Activity Status Table (2A.4.1) to create a distinction between “character defining” and “non-character defining” sites (as described in response to Submission 96, above). <p>As a final note, this submitter considers that a peer review of the Lifescapes Report should be prepared. I welcome such a review.</p>
104	Page, Michael & Janenne	Oppose	2A.4.1 21.1.2A Appendix DG1	Support the concept of character clusters.	Retain the Turere Lane character cluster	<p>Reject. The assessment criteria for character streets are necessarily rigorous, given its limiting effects on the MDRS, and as required by the “other matter” test of the Amendment Act (s77L).</p> <p>Turere Street did not meet this criteria (see the Lifescapes Report section 6.1/6.2), and as such it is considered appropriate to remove this street from character street coverage.</p>
105	Simone Williams	Support	2A.4.1 21.1.2A Appendix DG1	The Thornton Road/ Princes Street cluster collectively represents characteristics that are significant to Cambridge's local identity and history. MDRS would be inappropriate in this setting	That PC 26 is approved as notified - specifically as it relates to the proposed Thornton Road/ Princes Street character cluster	<p>Noted. See response to Submission 80.</p>

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106	Barbara Ross	Oppose	Proposed Planning Map 57; sections related to character clusters; Appendix DG1	Restrictions placed on these properties are unnecessary and contrary to the intention of the NPS-UD	That 517 Rewi Street be removed from the character cluster, That the Rewi Street and Bank Street character clusters are deleted.	<p>Reject.</p> <p>The Rewi Street Character Cluster has been identified following a rigorous methodology and site-specific assessment against criteria as set out in the Lifescapes Report.</p> <p>517 Rewi Street is a character defining site with an example of simple single-gable English Bungalow architectural style, and it is considered appropriate to include this site in the cluster.</p> <p>With regard to NPS-UD, it is noted that the Amendment Act specifically includes the opportunity for territorial authorities to limit development where justified by site-specific analysis, via the “other matter” qualifying matter at s77I(j). It is therefore considered appropriate to use this tool where site-specific analysis warrants it, given the contribution character clusters make to people and communities’ social and cultural wellbeing as part of well-functioning urban environments. It is noted that the potential gain in housing supply by removing this qualifying matter would be minimal, given the relatively small number of sites affected.</p>
107	Rodney Ross Re. 517 Rewi Street, Te Awamutu	Oppose	Appendix 2A 2A.3.3.3, 2A.4.1.1 (b) (g) (q); 2A.4.1.3 (d), 2A.4.2.22 (a); 15.4.1.1; 15.4.2.1; 21.1.2.5; 21.1.2A.4	Oppose the expansion of the character cluster areas from existing areas, in particular Rewi Street and Bank Street. These areas are located very near to the town centre and amenities and should be permitted to develop per the intent of the NPS-UD	That Council remove the Rewi Street and Bank Street character cluster from the amendments	<p>Reject.</p> <p>The Rewi Street and Bank Street Character Clusters have been identified following a rigorous methodology and site-specific assessment against criteria as set out in the Lifescapes Report.</p> <p>See comments above re intensification. It is noted that inclusion in a cluster does not preclude development but enables it to be managed in light of identified character values.</p>

Further submissions

Further sub #	Sub point	Support / Oppose / Support in part	Topic	PC Ref / DP Provision	Submission Summary	Decision requested	Response
FS 9	Kāinga Ora 79.14, 79.15	Support	Historic Heritage and Character – Qualifying Matters	Various, planning maps	Supports character clusters being removed from the proposed plan change and further analysis undertaken. The process to define the character areas has been rushed, the landscape reports flawed, and contrary to the intent of the NPS-UD, particularly for Rewi Street and Bank Street. Opposes the existing and proposed spatial identification (and associated provisions) of 'Character Streets'.	- Delete the character cluster statements and overlays in their entirety and undertake further analysis to determine the exact values of the resources that the Council seeks to manage the District Plan. - Delete 'character streets' in PC26.	Reject. It is noted that Kāinga Ora supports in part the retention of character clusters and streets in their evidence, following proposed amendments to PC26 as set out in the s42A report in response to the Lifescapes recommendations. I address matters raised by Kāinga Ora in my rebuttal evidence.
FS 10	79.14, 79.15	Support	Historic Heritage and Character – Qualifying Matters	Planning maps	(as above)	(as above)	Reject. See response to FS 9.