

From: rushworthmc@gmail.com
To: [Policy Shared](#)
Subject: External Sender: Plan Change 26 - Submission - C Rushworth
Date: Thursday, 29 September 2022 8:30:01 pm
Attachments: [Waipa PC 26 - C Rushworth.docx](#)

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Please find attached my submission on Plan Change 26 – Residential Zone Intensification.

In summary this

- Supports, in principle, the use of MDRS, where residential intensification is considered necessary in Cambridge, such as within 400m of the town centre – Objectives 2A.3.1 and 2A.3.2.
- Supports, in principle, the introduction of Character Clusters as a means of managing intensification within discrete parts of Cambridge, including Grey Street – Policies 2A.3.3.1e and 2A.3.3.4, and Rule 2A.1.9i.
- Opposes Rule 2A.4.1.3d activity status for alterations or additions to buildings in Character Clusters – these should be permitted activities with appropriate performance standards.

Regards,
Christina Rushworth

Mrs C Rushworth

29 September 2022

Dear Sir/Madam,

Waipa District Plan Change 26

I am please to provide the following submission on PC26 – Residential Zone Intensification.

Submission:

- Support, in principle, the use of MDRS, where residential intensification is considered necessary in Cambridge – Objectives 2A.3.1 and 2A.3.2.
- Support, in principle, the introduction of Character Clusters as a means of managing intensification within discrete parts of Cambridge, including Grey Street – Policies 2A.3.3.1e and 2A.3.3.4, and Rule 2A.1.9i.
- Oppose Rule 2A.4.1.3d activity status for alterations or additions to buildings in Character Clusters.

Reason:

Intensification should be proportionate to the needs for additional growth, the role and function of the district's centres and achieving well-functioning urban environments. Growth should be balanced with providing for the needs of the community and accessibility to services, in accordance with NPS-UD Policy 3d. Where intensification is considered necessary in Cambridge (such as within 400m walking distance of the town centre), the Medium Density Residential Standard (MDRS) should be used.

RMA section 77I introduces the ability to use Qualifying Matters to make the MDRS less enabling in order to manage effects on a range of matters with recognised features and attributes.

The NPS-UD sets out in Objective 4 that urban environments, including their amenity values, should develop over time in response to the diverse and changing needs of people, communities and future generations. Policy 1 establishes that planning decision, including those on District Plans, 'a) *have or enable a variety of homes ...*'. This does not require, or imply, that a consistent/uniform 'one size fits' all approach should be applied to intensification. It expects that there will be a range of outcomes that provide choice and diversity within the local market.

One of the guiding principles of Future Proof (2.4) is to '*ensure the sub regions towns and villages retain their individual and distinct identities ...*'.

Cambridge is well known for the quality of the town's urban environment. This reflects the historic urban form that includes traditional ¼ acre sections and extensive urban tree

cover. Traditional section sizes of up to 1000m² enable residents to grow their own food. These features contribute to a sustainable well-functioning urban environment.

The character, form and appearance of Cambridge's urban environment are integral parts of the town's strength. These factors provide a point of difference in the sub region and underpin the town's success and attractiveness to the market. If lost this will have an adverse effect on market choice and future investment decisions.

The larger section sizes within the Grey Street character cluster will ensure that there is choice and diversity within the local market. This represents a small amount of the total housing stock, and therefore limiting MDRS will not have a significant effect on the overall supply of housing land. The latest Future Proof Housing Development Capacity Assessment 2021 indicates that there is adequate capacity already available within Cambridge and the District over the short, medium and long term, even before the additional MDRS supply is added.

While safeguarding the character clusters from inappropriate levels of intensification is considered necessary to achieve positive outcomes for the urban environment, it is considered that some of the detailed provisions place an unreasonable and unnecessary regulatory burden on these properties.

It is considered inappropriate and unnecessary for Rule 2A.4.1.3d to include alterations or additions to existing buildings within character cluster areas as a Restricted Discretionary activity. It is important that homes can be maintained and improved efficiently. Homes should also be readily able to adapt, so that they can continue to meet the needs of residents. This includes upgrades that incorporate energy efficient materials that will contribute to reducing greenhouse gas emissions and make the structure more resilient to the potential effects of climate change, in accordance with Objective 8 of the NPS-UD, and the national Emissions Reduction Plan.

It is more efficient for alterations and additions to existing buildings in character clusters to be permitted activities. The effects of alterations and additions can be effectively managed through the application of appropriate performance standards. These could control the scale, location and appearance of alterations and additions. For example, this can be achieved through the use of boundary setbacks, extensions could be limited to being located to the side or rear elevations, the use of matching materials (or sympathetic new materials that improve thermal efficiency and reduce energy usage including solar panels), the scale is subordinate in size eg not more than 33% of the gross ground floor area at the time the plan change becomes operative.

The focus of controls should be on maintaining the overall character of the area, including plot size, site coverage and layout. The buildings are typically not uniform or heritage items, and the level of control proposed is considered excessive to manage the effects on the character cluster.

Outcomes sought:

Character Clusters are retained as a Qualifying Matter for Grey Street, Cambridge.

The activity status for alterations or additions to buildings within character clusters be amended to Permitted activity, subject to any necessary performance standards.

Christina Rushworth

From: [Mark & Christina Rushworth](#)
To: [Policy Shared](#)
Subject: Re: External Sender: Plan Change 26 - Submission - C Rushworth
Date: Friday, 30 September 2022 3:01:45 pm

Thanks for your email.

The additional information requested is set out in the email trail below against the relevant questions.

Regards,
Christina

On Fri, 30 Sep 2022 at 10:21 AM, Policy Shared <districtplan@waipadc.govt.nz> wrote:

Dear Christina,

Thank you for your email on proposed plan change 26. Please note that for your email to be treated as a submission on the plan change needs to contain all of the information required by Form 5 of the Resource Management (Forms, Fees and Procedure) Regulations 2003. The information required by Form 5 includes:

- Whether or not you could gain advantage in trade competition through your submission.

I WILL NOT GAIN ANY TRADE COMPETITION ADVANTAGE FROM THIS SUBMISSION

-
- If you are directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition.

I AM A PROPERTY OWNER IN THE AREA AFFECTED BY THE PLAN CHANGE -

-
- Whether you wish to be heard in support of your submission.

I WISH TO BE HEARD

-
- If you wish to be heard will you consider presenting a joint case with others who have made similar submissions at the hearing.

I WILL CONSIDER MAKING A JOINT CASE

-
- Your submission (whether you support or oppose specific provisions or wish to have them amended, and the reasons for your views)

SUPPORT (IN PRINCIPLE): Objectives 2A.3.1 and 2A.3.2. Policies 2A.3.3.1e and 2A.3.3.4, and Rule 2A.1.9i. GIVES EFFECT TO NPS-UD & MDRS.

OPPOSE: Rule 2A.4.1.3d INAPPROPRIATE & UNNECESSARY REGULATORY BURDEN. THERE ARE MORE EFFECTIVE MANAGEMENT TOOLS.

SEE ATTACHED LETTER FOR FULL DETAILS

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- The decision you wish Waipā District Council to make.

RETAIN use of MDRS, where residential intensification is considered necessary in

Cambridge, such as within 400m of the town centre.

RETAIN Character Clusters as a means of managing intensification within discrete parts of Cambridge, including Grey Street.

AMEND activity status for alterations or additions to buildings in Character Clusters to permitted activities with appropriate performance standards.

-
- Email or postal address

-
- Contact phone number

-
- Name of submitter

CHRISTINA RUSHWORTH

-

Some of the required information is contained within your email, but some necessary information is missing. This information can be on prescribed form 5 or included in your email or in a document attached to your email.

The below link will direct you to the proposed plan change 26 webpage where you can find the form available electronically or a hard copy under the heading 'There are multiple ways to make a submission'

<https://www.waipadc.govt.nz/our-council/waipad-district-plan/wpdc-variations/current-plan-changes/draft-plan-change-26-residential-zone-intensification>

Please note that submissions on proposed plan change 26 close at 5pm today, so please provide the information that is missing from your submission as soon as possible.

Nga Mihi,

District Plan Policy Team

From: [REDACTED]
Sent: Thursday, 29 September 2022 8:30 pm
To: Policy Shared <districtplan@waipadc.govt.nz>
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Regards,

Christina Rushworth

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Te Kaunihera ā Rohe o Waipa



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