

**From:** info@waipadc.govt.nz  
**Sent:** Friday, 30 September 2022 4:02 pm  
**To:** Policy Shared  
**Subject:** External Sender: Waipā District Plan - Plan Change Submission Form 5 - CKL NZ Limited

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<b>Full name of submitter</b>	CKL NZ Limited
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**This is a submission on the following proposed plan change to the Waipā District Plan**

Please refer to the attached letter.

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

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

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

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

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

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

Please refer to the attached letter.

**My submission is**

Please refer to the attached letter.

**I seek the following decision/s from Council**

Please refer to the attached letter.

**Attachments**

[CKL Submission on Plan Change 26.pdf](#)

30 September 2022

Planning Team  
Waipā District Council  
23 Wilson Street  
Cambridge 3434

**Our Ref:** Plan Change 26

Dear Planning Team,

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

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

If you have any questions, please contact the writer.

Yours faithfully  
CKL Planning | Surveying | Engineering | Environmental

A handwritten signature in blue ink, appearing to read 'Tracey Morse', with a stylized flourish at the end.

**Tracey Morse**  
Senior Planner – MNZPI

Provision	Submission	Recommended Change
<p><b>Policy 2A.3.3.4</b></p> <p>To maintain and enhance the identified character of each character cluster by:</p> <p>b) For new buildings or relocated buildings maintaining a similar style, form, building materials and colour to other dwellings within the cluster; and</p>	<p>Mimicry of heritage structures isn't always the most appropriate response for new structures/additions. It can dilute the integrity of the heritage character values of the heritage feature. Suggest amending to allow a diverse range of styles.</p>	<p><b>Recommend deleting (b)</b></p> <p><b>Policy 2A.3.3.4</b></p> <p>To maintain and enhance the identified character of each character cluster by:</p> <p><del>b) For new buildings or relocated buildings maintaining a similar style, form, building materials and colour to other dwellings within the cluster; and</del></p>
<p><b>Policy 2A.3.3.4</b></p> <p>To maintain and enhance the identified character of each character cluster by:</p> <p>c) For relocated buildings ensuring that any maintenance and/or reinstatement work is undertaken; and</p>	<p>It is not clear what this policy is trying to achieve, to relocate a building would need to go through building consent sign off and as such they would need to be up to a certain standard.</p>	<p><b>Recommend deleting (c)</b></p> <p><b>Policy 2A.3.3.4</b></p> <p>To maintain and enhance the identified character of each character cluster by:</p> <p><del>c) For relocated buildings ensuring that any maintenance and/or reinstatement work is undertaken; and</del></p>
<p><b>Objective 2A.3.4</b></p> <p>To maintain amenity values and enhance safety in the Medium Density Residential Zone.</p>	<p>This objective use of word "maintain" doesn't appear right. The existing residential character and amenity will be changing as a result of this zone change and how do you enhance safety? The policies which follow this objective are in relation to amenity and there is nothing around 'safety'.</p>	<p><b>Recommend amending the objective</b></p> <p><b>Objective 2A.3.4</b></p> <p>To <u>establish cohesive and liveable environments within</u> <del>maintain amenity values and enhance safety in</del> the Medium Density Residential Zone.</p>

<p><b>Objective 2A.3.6</b></p> <p>To enable a wide range of housing options in Cambridge, Te Awamutu and Kihikihi.</p>	<p>The objective is for the Medium Density Residential Zone, however the objective just lists the three main towns. Suggest this references the zones</p>	<p><b>Amend as follows:</b></p> <p>To enable a wide range of housing options in <u>the Medium Density Residential Zone Cambridge, Te Awamutu and Kihikihi.</u></p>
<p><b>Objective 2A.3.8</b></p> <p>To restrict the establishment of non-residential activities in the Medium Density Residential Zone, except for visitor accommodation, activities within listed heritage items, areas specifically identified on structure plans for this purpose, and those activities that provide for the health and well-being of the community, and have a functional and compelling need to locate within a Medium Density Residential Zone.</p>	<p>Within denser residential environments it is beneficial to have some non-residential activities including dairies, laundrettes and childcare facilities and these should not be restricted.</p>	<p><b>Amend as follow</b></p> <p>To restrict the establishment of non-residential activities in the Medium Density Residential Zone, except for visitor accommodation, activities within listed heritage items, areas specifically identified on structure plans for this purpose, and those activities that provide for the health and well-being of the community, and have a functional and compelling need to locate within a Medium Density Residential Zone <u>such as dairies, laundrettes and childcare facilities.</u></p>
<p><b>Activity Status Table 2A.4.1 (e)</b></p> <p>Accessory buildings to any permitted activity.</p>	<p>Often when subdividing a site, a garage or shed is left on the vacant lot. It is often required to store building material with the construction of a new dwelling, however as accessory buildings are only permitted if a residential dwelling is on the site, this should be removed to allow to have a shed or garage on a vacant lot.</p>	<p><b>Delete part</b></p> <p><b>Activity Status Table 2A.4.1 (e)</b></p> <p>Accessory buildings <del>to any permitted activity.</del></p>

<p><b>Activity Status Table 2A.4.1.3 (b)</b></p> <p>Four or more dwellings per site outside of the Infrastructure Constraint Qualifying Matter Overlay.</p> <p>Activities that fail to comply with this rule will require a resource consent for a restricted discretionary activity with discretion being restricted over:</p> <ul style="list-style-type: none"> <li>• Building location, bulk and design; and</li> <li>• Development density; and</li> <li>• ....</li> </ul>	<p>Within the matters of discretion, this should not include density as there is no effect of density, potentially could mean residential amenity?</p>	<p>Four or more dwellings per site outside of the Infrastructure Constraint Qualifying Matter Overlay.</p> <p>Activities that fail to comply with this rule will require a resource consent for a restricted discretionary activity with discretion being restricted over:</p> <ul style="list-style-type: none"> <li>• Building location, bulk and design; and</li> <li>• <del>Development density; and</del></li> </ul> <p>....</p>
<p><b>Activity Status Table 2A.4.1.3 (c)</b></p> <p>Three or more dwellings per site within the Infrastructure Constraint Qualifying Matter Overlay. Activities that fail to comply with this rule will require a resource consent for a restricted discretionary activity with discretion being restricted over:</p> <ul style="list-style-type: none"> <li>• Building location, bulk and design; and</li> <li>• Development density; and ...</li> </ul>	<p>Within the matters of discretion, this should not include density as there is no effect of density, potentially could mean residential amenity?</p>	<p><b>Activity Status Table</b></p> <p><b>Rule 2A.4.1.3 (c)</b></p> <p>Three or more dwellings per site within the Infrastructure Constraint Qualifying Matter Overlay. Activities that fail to comply with this rule will require a resource consent for a restricted discretionary activity with discretion being restricted over:</p> <ul style="list-style-type: none"> <li>• Building location, bulk and design; and</li> <li>• <del>Development density; and</del></li> <li>• ...</li> </ul>

<p><b>Rule 2A.4.2.9 (b)</b></p> <p>Impermeable surfaces must not exceed:</p> <p>(a) 45% of the net site area in the Cambridge North Structure Plan Area; or</p> <p>(b) 60% of the net site area in the remainder of the Zone (except St Kilda Structure Plan Area).</p>	<p>The different coverage for the Cambridge North Structure Plan Area is included as part of this rule, but then the St Kilda Structure Plan Area is excluded without stating what the rule for impervious surfaces there is, or being directly followed by the equivalent rule. It also appears that Council forgot to include within the Medium Density Zone section any controls for impermeable surfaces for the St Kilda Structure Plan Area.</p>	<p><b>Amend as follows</b></p> <p><b>Rule 2A.4.2.9</b></p> <p>Impermeable surfaces must not exceed:</p> <p>(a) 45% of the net site area in the Cambridge North Structure Plan Area; or</p> <p><del>(b) 60% of the net site area in the remainder of the Zone</del> <b>(b) 50% of the net site area in the St Kilda Structure Plan Area; or</b></p> <p><del>(b) 60% of the net site area in the remainder of the Zone</del> (highlighted space to enter the impermeable surfaces control that Council intended to be within the District Plan following PC26).</p>
<p><b>Rule 2A.4.2.22</b></p> <p>A residential dwelling of 2 or more stories shall have a minimum roof pitch of:</p> <p>(a) 30 degrees in any character area or compact housing area overlay</p> <p>(b) 15 degrees in all other parts of the zone</p>	<p>There isn't a clear RMA purpose of this rule. Providing roof pitches of these angles doesn't necessarily equate to quality urban design outcomes. Suggest remove.</p>	<p><b>Delete in full</b></p> <p><del><b>Rule 2A.4.2.22</b></del></p> <p><del>A residential dwelling of 2 or more stories shall have a minimum roof pitch of:</del></p> <p><del>(a) 30 degrees in any character area or compact housing area overlay</del></p> <p><del>(b) 15 degrees in all other parts of the zone</del></p>
<p><b>Rules 2A.4.2.25-30, .55, .57-59</b></p>	<p>These rules should go at end of the rules for the zone, as they are all solely site-specific. Otherwise, zone-wide standards can get lost/missed.</p>	<p><b>Amend order of rules so that those listed are last within Section 2A</b></p>

<p><b>Rule 2A.4.2.62</b></p> <p>A relocated building over 40m<sup>2</sup> GFA shall meet the following requirements:</p> <p>...</p>	<p>There isn't a clear RMA purpose of this rule. Surely the aesthetic and weatherproof finish of relocated structures is more appropriately covered by the Building Act / Building Code / Building consent process.</p>	<p><b>Delete in full</b></p> <p><del>Rule 2A.4.2.62</del></p> <p><del>A relocated building over 40m<sup>2</sup> GFA shall meet the following requirements:</del></p> <p><del>...</del></p>
<p><b>Rule 15.4.1.1 (o)</b></p> <p>Subdivision to create three to six lots for infill housing between 350m<sup>2</sup> to 500m<sup>2</sup> in conjunction with a land use consent for the development</p> <p><b>Residential Zone – RD</b></p> <p><b>Medium Density Residential Zone – NA</b></p>	<p>Infill subdivision should not be limited to three to six lots, CKL have previous been granted consent to undertake infill development comprising one additional infill lot and up to nine infill lots. Other proposals we have sought pre-application advice on have given the nod to fourteen infill lots without land use consent for 400m<sup>2</sup>, therefore this shouldn't be restricted by number or by concurrent land use consent. If a proposed dwelling does not meet the rules of the ODP this will be picked up at building consent stage and a land use consent would then be sought at this stage.</p> <p>There is no reason to have this limitation on number of lots being created and this also should apply to the Medium Density Residential Zone.</p>	<p><b>Amend rule as follows</b></p> <p><b>Rule 15.4.1.1 (o)</b></p> <p>Subdivision to create three <del>to six</del> <u>or more</u> lots for infill housing between 350m<sup>2</sup> to 500m<sup>2</sup> <del>in conjunction with a land use consent for the development</del></p> <p><b>Residential Zone – RD</b></p> <p><b>Medium Density Residential Zone</b> <del>for four or more lots –</del> <u>NA-RD</u></p>

<p><b>Rule 15.4.2.1 (b)</b></p> <p>Residential Zone – Minimum Net Lot Area - 500m<sup>2</sup> (except for subdivision around dwellings existing as of 31 May 2012, where the minimum net site area containing the existing dwelling is 400m<sup>2</sup>).</p> <p>Average Net Lot Area - &gt;600m<sup>2</sup> for 3 or more lots</p>	<p>On many occasions, consents have been granted with a smaller lot size of 500m<sup>2</sup>, especially around one additional lot in the residential zone.</p> <p>This minimum lot size should be reduced to reflect what is occurring throughout the district.</p> <p>Again, assessment at the building consent stage would pick up that a suitable dwelling is being constructed on the site.</p>	<p><b>Amend rule as follows</b></p> <p><b>Performance standard 15.4.1 (b)</b></p> <p>Residential Zone – Minimum Net Lot Area - <del>535</del>50m<sup>2</sup></p> <p>Average Net Lot Area - &gt;<del>65</del>00m<sup>2</sup> for 3 or more lots</p>
<p><b>Rule 15.4.2.1A</b></p> <p>Subdivision within the Medium Density Residential Zone is not required to comply with the lot area rules in Rule 15.4.2.1 or the lot frontage or lot shape factor rules in Rule 15.4.2.3 provided that:</p> <p>(a) Subdivision around an existing dwelling (including a dwelling for which land use consent has been granted but not yet implemented) must not result in any new non-compliance or increase the degree of any existing non-compliance</p>	<p>On many occasions, consents have been granted with a smaller lot size of 500m<sup>2</sup>, especially around one additional lot in the residential zone.</p> <p>This minimum lot size should be reduced to reflect what is occurring throughout the district.</p> <p>Again, assessment at the building consent stage would pick up that a suitable dwelling is being constructed on the site.</p>	<p><b>Amend rule as follows</b></p> <p><b>Performance standard 15.4.1 (b)</b></p> <p>Residential Zone – Minimum Net Lot Area - <del>535</del>50m<sup>2</sup></p> <p>Average Net Lot Area - &gt;<del>65</del>00m<sup>2</sup> for 3 or more lots</p>



<p>with the performance standards in Section 2A – Medium Density Residential Zone. There must be no vacant lots created as part of the subdivision.</p> <p>(b) Subdivision around a proposed dwelling must be accompanied by a land use application that is to be determined concurrently with the subdivision application and which demonstrates that it is practicable to construct a dwelling on every allotment within the proposed subdivision as a permitted activity, and each dwelling complies with the performance standards in Section 2A – Medium Density Residential Zone. There must be no vacant lots created as part of the subdivision.</p>		
<p><b>Rule – 15.4.2.3</b> Medium density residential except front lots on entrance corridors</p>	<p>Often with infill development, the lot frontage of 20m cannot be achieved and there are many examples of previous subdivisions where lot</p>	<p><b>Amend rule as follows</b> <b>Rules – Lot frontage, lot shape factor and vehicle crossings – 15.4.2.3</b></p>

<ul style="list-style-type: none"> <li>- lot frontage 20m, lot shape factor 13m diameter circle, Vehicle crossing – 3m -5.5m</li> </ul> <p>Medium density residential front lots on entrance corridors</p> <ul style="list-style-type: none"> <li>- Lot frontage 25m, lot shape factor 16m diameter circle, vehicle crossing – 3m - 5.5m</li> </ul> <p>Residential except front lots on entrance corridors;</p> <ul style="list-style-type: none"> <li>- Lot frontage 20m, lot shape factor 13m diameter circle, Vehicle crossing – 3m - 5.5m</li> </ul> <p>Residential front lots on entrance corridors</p> <ul style="list-style-type: none"> <li>- Lot frontage 25m, lot shape factor 16m diameter circle, vehicle crossing – 3m - 5.5m</li> </ul>	<p>frontage reduces down to the existing dwelling on the site of the physical existing lot frontage is 20m and once you take of a crossing for a rear lot this reduces to 16m, therefore this is a consistent non-compliance with resource consent applications and should be amended to reflect what is being approved.</p> <p>With smaller sized lots it also means a 13m or 16m diameter circle would not be achievable, need to consider smaller lots in new subdivisions for duplexes or units.</p> <p>Assessment at the building consent stage will ensure that an appropriately sized dwelling is established on the site otherwise a land use consent would need to be sought.</p>	<p>Medium density residential except front lots on entrance corridors</p> <ul style="list-style-type: none"> <li>- Lot frontage <del>21</del>0m, <del>lot shape factor 13m diameter circle</del>, Vehicle crossing – 3m -5.5m</li> </ul> <p>Medium density residential front lots on entrance corridors</p> <ul style="list-style-type: none"> <li>- Lot frontage <del>21</del>5m, lot shape factor <del>106</del>m diameter circle, vehicle crossing – 3m -5.5m</li> </ul> <p>Residential except front lots on entrance corridors;</p> <ul style="list-style-type: none"> <li>- Lot frontage <del>21</del>0m, <del>lot shape factor 13m diameter circle</del>, vehicle crossing – 3m -5.5m</li> </ul> <p>Residential front lots on entrance corridors</p> <ul style="list-style-type: none"> <li>- Lot frontage <del>21</del>5m, lot shape factor <del>106</del>m diameter circle, vehicle crossing – 3m -5.5m</li> </ul>
<p><b>Rule 15.4.2.40</b></p> <p>As a result of the use of this rule, Council shall....</p>	<p>This rule doesn't make sense as it doesn't link back to the rule it refers to, need to add the link.</p>	<p><b>Amend rule as follows</b></p> <p><b>15.4.2.40</b></p> <p>As a result of the use of <del>this</del> rules <del>15.4.2.35- 15.4.2.39</del>, Council shall....</p>
<p><b>Rule 18.5.1.1(e) and (f)</b></p>	<p>these should be (i) and (ii).</p>	<p><b>Amend rule as follows</b></p>

<p>The general rules are as follows:</p> <p>...</p> <p>(d) Financial contributions will be required for the purposes set out and on the basis that:</p> <p>(e) Financial contributions for all residential development will be calculated for the specific purposes and in accordance with the methodology in the applicable rules and performance standards; and</p> <p>(f) Financial contributions for all other developments will be calculated for the specific purposes and in accordance with the methodology in the applicable rules and performance standards.</p>		<p><b>18.5.1.1</b></p> <p>The general rules are as follows:</p> <p>...</p> <p>(d) Financial contributions will be required for the purposes set out and on the basis that:</p> <p>(ei) Financial contributions for all residential development will be calculated for the specific purposes and in accordance with the methodology in the applicable rules and performance standards; and</p> <p>(fii) Financial contributions for all other developments will be calculated for the specific purposes and in accordance with the methodology in the applicable rules and performance standards.</p>
<p><b>Rule 18.5.1.2</b></p> <p>The following rules outline the purpose for the financial contributions being taken.</p> <p>(a) In addition to the general rules, and performance standards, financial contributions will be required for</p>	<p>This isn't a rule.</p>	<p><b>Amend rule to be an advice note</b></p>

<p>development for the following purposes:</p>		
<p><b>Rule 18.5.1.3(c)(ii) and (iii)</b></p> <p>To avoid, remedy and mitigate the adverse effects of residential development, or ensure positive effects on the environment to offset any adverse effect, through the recovery of infrastructure network costs associated with the following:</p> <p>...</p> <p>(c) These costs will include:</p> <p>...</p> <p>(ii) Where an existing supply is available, but the capacity of the system is inadequate to meet the additional generated demand, the cost of connection and capacity upgrading of the existing system;</p> <p>(iii) Where an existing supply is available, but the network requires capacity upgrades or network improvements to ensure the connection does not</p>	<p>This should have “as appropriate for the scale of residential development subject to the proposal”, or similar, to ensure that developers are contributing their share to the upgrade works, but not responsible for the capacity associated with other sites within the catchment.</p>	<p><b>Amend Rule as follows</b></p> <p><b>Rule 18.5.1.3(c)(ii) and (iii)</b></p> <p>To avoid, remedy and mitigate the adverse effects of residential development, or ensure positive effects on the environment to offset any adverse effect, through the recovery of infrastructure network costs associated with the following:</p> <p>...</p> <p>(c) These costs will include, <u>as appropriate for the scale of residential development subject to the proposal</u>:</p> <p>...</p> <p>(ii) Where an existing supply is available, but the capacity of the system is inadequate to meet the additional generated demand, the cost of connection and capacity upgrading of the existing system;</p> <p>(iii) Where an existing supply is available, but the network requires capacity upgrades or network improvements to ensure the connection does not</p>

<p>compromise the network, the costs of those capacity upgrades or network improvements; and</p> <p>...</p>		<p>compromise the network, the costs of those capacity upgrades or network improvements; and</p> <p>...</p>
<p><b>Rule 18.5.1.3(c)(iv)</b></p> <p>...</p> <p>(iv) Where an existing network is not available, the cost of extending the network;</p> <p>...</p>	<p>This should have added “and a development is within XXXm [being some form of appropriate proximate distance to nearby extent of network]”, so that developers are not paying to extend networks large/inappropriate distances away.</p>	<p><b>Amend Rule as follows</b></p> <p><b>Rule 18.5.1.3(c)(v)</b></p> <p>...</p> <p>(iv) Where an existing network is not available <u>and a development is within 250m of the nearest network</u>, the cost of extending the network;</p> <p>...</p> <p><u>(d) Calculations for contributions shall be as set out in the performance standards.</u></p>
<p><b>Rule 18.5.1.4</b></p> <p>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.</p> <p>(a) These costs will include:</p>	<p>This wording is very vague – it is unclear which assets it is referring to, what are the criteria for determining proximity/relevance of assets to proposals, and how costs will be quantified. Public open spaces and streetscape amenity are both features that can always be enhanced/improved, so without clear parameters on how, that’s a very arbitrary threshold to have.</p>	<p><b>Amend rule as follows</b></p> <p><b>18.5.1.4</b></p> <p>...</p> <p><u>(b) Calculations for contributions shall be as set out in the performance standards.</u></p> <p>[and add relevant performance standards]</p>

<p>(i) Where public open spaces can be improved, the cost of land acquisition and development; and</p> <p>(ii) Where streetscape amenity can be enhanced, the cost of that enhancement.</p>		
<p><b>Rule 18.5.2.1</b></p> <p>To avoid, remedy or mitigate the adverse effects of medium density residential development through the recovery of costs associated with maintaining and improving residential amenity.</p>	<p>This is worded more like an advice note to give context to Rules 18.5.2.2 – 4.</p> <p>As written, it would be very difficult to assess a proposal against this rule and we suggest it is deleted or moved to a more appropriate section of the plan.</p>	<p><b>Delete rule</b></p> <p><del>Rule 18.5.2.1</del></p> <p><del>To avoid, remedy or mitigate the adverse effects of medium density residential development through the recovery of costs associated with maintaining and improving residential amenity.</del></p>
<p><b>Rule 18.5.2.3</b></p> <p>For each additional bedroom at the site created by the development, a fixed financial contribution of \$400.00 shall be required.</p>	<p>An extra 6m<sup>2</sup> room attached to an existing dwelling is extremely unlikely to have adverse effects on residential amenity.</p> <p>Therefore, this rule is not believed to be in accordance with the RMA section 77E and should be removed.</p>	<p><b>Delete rule</b></p> <p><del>Rule 18.5.2.3</del></p> <p><del>For each additional bedroom at the site created by the development, a fixed financial contribution of \$400.00 shall be required.</del></p>
<p><b>Rule 18.5.2.4</b></p> <p>Greenfield development will be required to pay 80% of the rate specified in Rule 18.5.2.3.</p>	<p>In a greenfield development, there are specified Development Contributions that cover infrastructure provision, the District Plan then outlines what is considered appropriate in</p>	<p><b>Delete rule</b></p> <p><del>Rule 18.5.2.4</del></p> <p><del>Greenfield development will be required to pay 80% of the rate specified in Rule 18.5.2.3.</del></p>

	<p>terms of amenity and therefore a proposal consistent with the District Plan should not require a financial contribution to offset the adverse effects from amenity.</p> <p>The Development Contributions Policy dated June 2022 outlines the purpose that ‘Development contributions provide Council with the means to fund infrastructure required due to growth.’</p> <p>In greenfield areas, the development contributions are established based on the infrastructure necessary to service the development. For example, the C1 growth cell is \$73,182 and T1 is \$21,925.</p> <p>By introducing a financial contribution on top of this established Development Contribution is putting additional financial burden on developers.</p>	
<p><b>Rule 18.5.2.5</b></p> <p>Costs will be recovered where it is necessary to avoid, remedy or mitigate the adverse effects of medium density</p>	<p>This is worded more like an advice note, it would be very difficult to assess a proposal against this rule and suggest it is moved to the policy section of the plan.</p>	<p><b>Delete rule</b></p> <p><del>Rule 18.5.2.5</del></p> <p><del>Costs will be recovered where it is necessary to avoid, remedy or mitigate the adverse effects of medium density</del></p>

<p>residential development on the water quality and/or the minimum flows of the Waikato and Waipā Rivers and their catchments.</p>	<p>Also, what is the threshold for requiring contributions under Te Ture Whaimana? Not stated anywhere.</p> <p>As such rules need to be deleted.</p>	<p><del>residential development on the water quality and/or the minimum flows of the Waikato and Waipā Rivers and their catchments.</del></p>
<p><b>Rule 18.5.2.6</b></p> <p>For each additional bedroom at the site created by the development, a fixed financial contribution of \$400.00 shall be required.</p>	<p>An extra 6m<sup>2</sup> room attached to an existing dwelling is extremely unlikely to have adverse effect on water quality. This rule as written affects all zones including Large Lot and Rural.</p> <p>Therefore, this rule is not believed to be in accordance with the RMA section 77E and should be removed.</p>	<p><b>Delete rule</b></p> <p><del>Rule 18.5.2.6</del></p> <p><del>For each additional bedroom at the site created by the development, a fixed financial contribution of \$400.00 shall be required.</del></p>
<p><b>Rule 18.5.2.8</b></p> <p>Non-residential development in all zones: \$2,000.00 per 100m<sup>2</sup> of Gross Floor Area.</p>	<p>This rule is intended to cover all zones, there is no justification for this rule and no detail on what is trying to be achieved.</p> <p>It would result in any shed over 100m<sup>2</sup> constructed on a rural farm being required to pay a financial contribution.</p>	<p><b>Delete rule</b></p> <p><del>Rule 18.5.2.8</del></p> <p><del>Non-residential development in all zones: \$2,000.00 per 100m<sup>2</sup> of Gross Floor Area.</del></p>
<p><b>Rule 18.5.2.10</b></p> <p>The maximum amount of Financial Contribution that may be taken for connection to a water supply system in a</p>	<p>It appears that this rule is intended to apply to those that have not paid a development contribution and want to connect. However, the current wording of this rule instead it applies to all water connections.</p>	<p><b>Delete rule</b></p> <p><del>Rule 18.5.2.10</del></p> <p><del>The maximum amount of Financial Contribution that may be taken for connection to a water supply system in a</del></p>



<p>Council reticulated water supply area shall be the greater of: ....</p>	<p>The development contribution's purpose is for water infrastructure upgrades. The Development Contributions Policy dated June 2022 outlines the specific costs for water from a new development, adding in financial contributions for water supply is requiring money twice for the same provisions.</p>	<p><del>Council reticulated water supply area shall be the greater of: ....</del></p>
<p><b>Rule 18.5.2.24</b> The following rules apply when a contribution of land has been offered: ...</p>	<p>This rule applies to all the groups of performance standards for this section. As such, it should be located be at the start of them, rather than at the end.</p>	<p><b>Amend order of rules</b></p>
<p><b>Rule 18.5.2.25</b> In circumstances where Council exercises its discretion to collect a financial contribution in the form of a combination of land and money, the contribution must be assessed in terms of both the applicant Rule and performance standards (whichever applies).</p>	<p>This rule applies to all the groups of performance standards for this section. As such, it should be located be at the start of them, rather than at the end.</p>	<p><b>Amend order of rules</b></p>
<p><b>Maps 56 and 57 – Qualifying Matters, Cambridge, Te Awamutu-Kihikihi</b></p>	<p>Based on a review of the specialist reports supporting the plan change, it is not clear whether water leak improvement has been applied to the water model per the water</p>	<p>Amend maps to provide a more accurate representation of infrastructure constrain qualifying matter</p>

	<p>Management Plan forecasts of 2019. It is considered that this would provide increased capacity for further development.</p> <p>Based on a review of the specialist reports supporting this plan change, it is unclear if consideration has been given to the use of private wastewater pump stations. These could detain wastewater to pre development and pump at off peak times into the wastewater network.</p> <p>Further, for the wastewater network, it is unclear if inflow and infiltration reduction measures have been applied to maximise capacity in the network.</p>	
<b>Zone Map 8 - Ohaupo Deferred Large Lot Residential zone</b>	<p>Due to the lack of available land for development in Ohaupo, Futureproof support the development of the O3 and O4 ahead of the 2035 deferral.</p> <p>Therefore, in alignment with the aspirations for the urban Growth, this growth cell should be bought forward as part of Plan Change 26.</p>	Remove deferred status on Ohaupo growth cell areas O3 and O4 to make the zoning Large Lot Residential Zone.
<b>Zone Map 39 – Te Awamutu (East)</b>	The urban limits line on the plan does not match the equivalent policy plan (in the ODP).	Amend plan to reflect policy plan area

<b>Zone Map 40 – St Leger</b>	The urban limits line and structure plan line on the plan does not match the equivalent policy plan (in the ODP). (This occurs on a number of maps and we suggest others are checked for consistency).	Amend plan to reflect policy plan area
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