



COGSWELL SURVEYS
SURVEYING | ENGINEERING | PLANNING

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My name is Rebecca Steenstra and I work for Cogswell Surveys who are based in Cambridge. I have a Bachelor of Social Sciences majoring in Geography and Political Science with first class honours in Environmental Planning.

I have spent my years initially in the public sector, here at Waipa processing resource consents as a Graduate Planner. I quickly progressed to a planner and spent three years here. After an overseas experience, I then went on to some consultancy experience at BCD Group for three years which included a secondment to WEL energy and Waikato District Council. Through the process with WEL energy, I became involved in the Waipa District Plan review in 2012/2013. Following on from that I came back to work at Waipa in a consenting role again, then into a Senior Planner role for another few years. Almost 4 years ago I moved to Cogswell, where I am now mainly focussing on consenting subdivisions.

As you will be aware, Cogswell have operated in Waipa for over 50 years and Pete, Phil, and myself all have a very individual experience of how the District Plan rules have evolved over the past 20 + years, myself personally seeing the life of almost two District Plan cycles at Waipa, from both the public and the private sectors.

The points raised in our submission come naturally from an operational perspective of the rules, given our day-to-day work. As Waipa have placed two qualifying matter overlays for Stormwater and Wastewater over the majority of the Residential Zone, it will create a need for an infrastructure capacity assessment within new Rule 15.4.2.19, for subdivisions which would need to be submitted with an application. As we understand, and without going to great lengths reviewing all of the infrastructure reports, there are particular constraints on both of those networks in particular areas. There is not a constraint over the entire of the network. There must be an opportunity to look a little more closely at the residential areas and consider which areas can accommodate more growth and how those overlays can be pin pointed or more localised around those pressure points.

Any subdivision will take 9 to 12 months to complete. A house build, likely an equal time. If a subdivision and land use consent is required to complete the development, then there is significant warning given to Council before the demand created by the consent approval is actually realised by connecting to the Council system. It is understood that some areas are exceeding capacity due to having smaller pipes, however there are areas which have capacity available and those could still be comfortably developed in line with a close eye on the infrastructure modelling. If Council carefully keeps this modelling live, inserting all additional anticipated demand into the model (perhaps at the time when the development is approved rather than at the time of connection), then it should keep them 'ahead of the game' and always stopping development well in advance of exceeding available capacity. Also, this would inform funding decisions, feeding into the LTP also by considering anticipated DC levies and rates revenue.

The operational issue of placing the infrastructure overlays over the residential properties is around having access to good, reliable data that is quickly available. Currently the wait time for access to any modelling information has been months and is very expensive. It would be really good to understand how this information will be accessed and if it will become part of the consent application fee with Council, or a pre-application fee? I note the proposed definition for 'Infrastructure Capacity Assessment' requires the content of an assessment to be agreed with Waipa on a case by case basis. This simple process of just agreeing the content has the potential to add cost and time on to projects also. Also, I note that WSP holds the modelling on behalf of Council. Can raw data from WSP be provided, or do we always need a consultant involved as well as per the wording of Rule 15.4.2.19? I would encourage Council to carefully consider these operational issues, as it will have significant cost and time implications for most subdivision projects we will complete, which has obvious flowon effects (delay of rates, delay of DC revenue, reduced funds for council, reduced housing supply etc).

Aside from the operational issues, we have listed some suggestions in the submission around how we see some improvements in the rules. As follows:-

- Rule 2A.4.2.8 relating to deleting some matters of discretion relating to the stormwater overlay appear to also have been adopted as per our recommendation in the s42a report addendum. However, 40% building coverage rather than impermeable area is retained as per Mike Chapman's evidence and recommendation dated 27 March 2023. I comment that if the site is outside of a high-risk flood area, are not obstructing an overland flow path and are not within the modelled 100-year flood event, then the buildings are not filling in a flood plain and can therefore tolerate a higher site coverage of 50% as per the MDRS provisions. An option to alleviate some pressure could be to attenuate to a 50-year event onsite.
- Rule 2A.4.1.3(C) relating to the matters of discretion for three dwellings per site has been amended generally as per our recommendation in the s42a report addendum.
- Rule 2A.4.2.6(c) relating to the setback to reserves should be reconsidered, despite the comments from XYST, I think they should be considered from an Urban design perspective. Dwellings along reserves should provide passive surveillance rather than have large separation. Eyes on the public space is encouraged, as is a higher density in these locations. Also, backyard or section size may be sacrificed intentionally for use of the adjoining reserve. These are basic CPTED principals. Crime Prevention Through Environmental Design is an important theme through the District Plan.
 - o In this same Rule, in point (f), The setback from SNA should remain at 10m to be consistent with the Rural Zone. This is adequate in those areas and should remain consistent. If there are bats or other species to protect there would be protocols in place to manage this. An ecologist can be involved if development is closer than 10m, however 20m in a residential zone is significant. It should be noted that the width of an average section currently is only required to be 20m. You could prevent development on some sites.
- Rule 2A.4.2.54 Compact housing rule appears to be deleted in the s42 addendum. As stated in the submission, Cogswell support some high-density housing. High density development should be provided for. Compact housing will no longer exist, therefore a new rule should be introduced allowing high density apartments or terraces to occur in appropriate locations. This should include around reserves or commercial areas. The compact housing overlays

could be considered for re-use for this purpose. Waipa has never covered this type of development well, and traditionally has always default to a notification process.

- Vehicle access rules do not appear to be covered off, Rule 15.4.2.4 is missing from the Rules. The rules require a minimum width to serve a certain number of lots currently, for example you require a 4m access width to serve three lots. As many rear lots are currently constrained by 3.6m or 4m wide access but are large enough to develop, how will this rule be dealt with?

Overall, we support the plan change in part with specific consideration to the above matters.

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