

**BEFORE THE HEARING PANEL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of Proposed Plan Change 5 to the Operative Hamilton  
City District Plan

---

**STATEMENT OF EVIDENCE OF IAN COLIN MUNRO  
(URBAN DESIGN – LOCAL CENTRES)**

**Dated 2 September 2022**

---

---

**LACHLAN MULDOWNEY**  
BARRISTER

**P** +64 7 834 4336 **M** +64 21 471 490

**Office** Panama Square, 14 Garden Place, Hamilton

**Postal** PO Box 9169, Waikato Mail Centre, Hamilton 3240

**[www.lachlanmuldowney.co.nz](http://www.lachlanmuldowney.co.nz)**

## INTRODUCTION

1. My full name is Ian Colin Munro.
2. I am an urban designer and urban planner. I have the qualifications of a Bachelor of Planning and Masters degrees in Planning, Architecture [Urban Design], Environmental Legal Studies and Engineering Studies [Transportation]. I am a Full Member of the New Zealand Planning Institute (**NZPI**) and I have 23 years of experience, all in New Zealand. I have been involved in over 30 major greenfield plan changes across New Zealand and which include new networks of urban centres. I have particular experience in planning new urban centres including matters pertaining to location and sizing, zone configurations and extents, planning provisions, master planning, and development testing. I have included a standard CV as **Attachment 1**.
3. I was not involved in the preparation of Plan Change 5 (**PC5**) or its directly supporting documents, although I have provided previous advice to Hamilton City Council (**Council**) as it went about reviewing its Operative Peacocke Structure Plan ahead of commencing PC5. Since notification of PC5 the Council has engaged me to review and comment on submissions raising urban design issues relevant to urban centres, and make recommendations on any associated changes to provisions within PC5. In respect of all other urban design matters, I understand that BECA Planning Ltd is addressing those.
4. I confirm that I participated in an expert conference of retail, urban design and planning experts on 25 August 2022. I continue to agree with the urban design statements set out in the Joint Witness Statement (**JWS**) arising from that.
5. I confirm that I authored a technical report to the Council dated 26 August 2022, wherein I provided a brief summary of my analysis of the submissions

identified for me to consider, and my recommendations, I continue to hold the opinions expressed in that report, I have included this as **Attachment 2**.

#### **CODE OF CONDUCT**

6. I have read the Environment Court Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2014 and agree to comply with it. I confirm that the opinions expressed in this statement are within my area of expertise except where I state that I have relied on the evidence of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.
7. In terms of my obligations under the Code, I confirm that I have no expertise in the identification of the amount of land that should be zoned for each of the centres proposed within PC5 and that I am reliant on other experts to confirm that. My expertise does extend to the spatial location, shape and configuration of whatever quantum is arrived at.

#### **SCOPE OF EVIDENCE**

8. My evidence, presented on behalf of HCC as proponent of PC5, will affirm and set out a summary of the matters explained in my technical report and the JWS.
9. Notwithstanding paragraphs 4 and 5 above, in this evidence I will also as appropriate update the conclusions and opinions I have previously reached based on the revised Council position on the PC5 Plan provisions, which are attached to Mr Sharman's section 42A report, and which were provided to me on 31 August 2022.

**EXECUTIVE SUMMARY**

10. I have reviewed the PC5 material and the submissions provided to me by the Council. I have participated in an Expert Conference for retail, urban design and planning experts. I have reviewed and commented on the Local Centre Design Guide as it has been refined by the Council, and lastly I have reviewed the updated PC5 provisions attached to Mr. Sharman's section 42A report.
  
11. I have agreed or agreed in part with submissions where the urban design outcomes sought by PC5, which are in my opinion logical and compelling, could be enhanced by changes to the notified provisions. In summary the most consequential changes arising are:
  - a) Additional building height in the neighbourhood centre and local centre zones;
  - b) Refinements and simplifications to the Local Centre Design Guide; and
  - c) Provision for high density dwellings at the ground floor of buildings within the Local Centre zone subject to locational requirements.
  
12. On the basis that the urban design outcomes to be enabled by PC5 have improved compared to the notified version, the revisions proposed and attached to Mr. Sharman's section 42A report can be seen as being the more effective and appropriate.
  
13. In urban design terms PC5 will enable urban design outcomes within the local centre and neighbourhood centres that can be regarded as being in line with industry best practice.

## ANALYSIS OF SUBMISSIONS AND RECOMMENDATIONS

14. I was asked by the Council to review and comment on the following submissions and submission points:
- a) **Sub 1 (Glenview Club)** – 1.7
  - b) **Sub 13 (Jones Land)** – 13.12, 13.13
  - c) **Sub 21 (Transpower)** – 21.2, 21.3
  - d) **Sub 22 (Woolworths)** – 22.1
  - e) **Sub 38 (Director-General of Conservation)** – 38.40, 38.53
  - f) **Sub 53 (The Adare Company)** – 53.24, 53.25, 53.41, 53.44, 53.46, 53.48, 53.51, 53.57, 53.87, 53.90, 53.101
  - g) **Sub 55 (Kainga Ora)** – 55.13, 55.14, 55.49, 55.50, 55.192, 55.251, 55.243, 55.249, 55.301, 55.312
15. I **disagree** with submission points 1.7; 21.2 and 21.3; 22; 53.24; 53.101; and 55.192 & 55.251 for the reasons set out in my technical report and/or as elaborated within the JWS. Specifically:
- a) 1.7: the proposed neighbourhood centre zone standard relates to gross floor area (i.e., internally within a building) and does not impede any associated outdoor amenity that might be associated with a centre.
  - b) 21.2 & 21.3: zoning the Transpower site at 25 Hall Road to Business 1: Commercial Fringe zone would have the effect of adding a de-facto commercial centre to an area of Peacocke that is already proposed to be served by a logical network of centres (one north and one south of the submitter's site). The proposed relief would undermine those.
  - c) 22: The proposed local centre is in my opinion spatially capable of accommodating one to two supermarkets in a number of

configurations. Spreading the centre zone to the western side of Peacockes Road would fragment the zone and not achieve the social or amenity outcomes sought by the proposed plan framework. Retaining the centre contiguously on the eastern side of the road (as proposed by the Council) is the superior outcome.

- d) 53.24: The key design principles set out in Chapter 3A are generalised principles underpinning the thinking behind the Peacocke Structure Plan. They are not as precise or specific as the existing guidance set out within the Local Centre Design Guide and would not add to the assessment of resource consents.
  - e) 53.101: I recommend that a consent opportunity be provided to 'round off the edges' of the Local Centre zone boundary at the time of resource consent (by way of residential activities at the ground floor of buildings) in preference to reducing the size of the Local Centre Zone.
  - f) 55.192 & 55.251: The changes proposed to the text will not make the District Plan simpler to administer or understand than the Council's proposed wording.
16. I **agree** with submission points 13.12; 53.25 & 53.90 (in part); 53.41; 53.44; 53.46 & 53.57; 53.48 & 53.51 (in part); 55.243; 55.301 (in part); and 53.312 (in part), for the reasons set out in my technical report and/or as elaborated within the JWS. Specifically:
- a) 13.12 (as I understand the submission point): dairies should be non-complying activities within the Medium Density Residential Zone so as to support and enhance the role of the neighbourhood centres.
  - b) 53.25 & 53.90 (in part): I agree that the proposed local centre diagrams and the Local Centre Design Guide could be refined and

simplified, and this has occurred. I have reviewed and am supportive of the updated guideline (**Appendix 1.4**) now attached to the section 42A report.

- c) 53.41: I agree that if the intent is to limit the overall GFA extent of a neighbourhood centre, the relevant 'maxima' standards for activities should apply in the cumulative rather than for individual outlets. This is reflected in proposed standard **NCZ-PREC1-PSP: RXX** as attached to the section 42A report.
- d) 53.44: I agree that there is no benefit in a Floor Area Ratio control based on the other standards proposed in the neighbourhood centre zone. Notified standard **NCZ-PREC1-PSP: R47** is proposed to be deleted in the provisions attached to the section 42A report.
- e) 53.46 & 53.57: existing signage standards from the Plan should apply to the proposed neighbourhood and local centre zones within Peacocke.
- f) 53.48 & 53.51: I agree that residential activities at the ground floor of buildings within the Local Centre Zone could be discretionary activities subject to specific criteria regarding their placement within the zone, and that high density housing (i.e., terrace housing or apartment buildings) be focused on. This is reflected in new standards **LCZ-PREC1-PSP: R21** (apartment buildings) and **LCZ-PREC1-PSP: R38** (terraced housing) as attached to Mr. Sharman's evidence. Standards LCZ-PREC1-PSP: R36 (single dwellings) and LCZ-PREC1-PSP: R37 remain non-complying activities.
- g) 55.243: I support additional height than was notified within the Neighbourhood Centre Zone to better maximise the capability of the land to accommodate intensive development and support a neighbourhood-scale commercial node. This is reflected in revised

standard **NCZ-PREC1-PSP: R44** (12m to 16m) as attached to the section 42A report.

- h) 55.301: commercial places of assembly can contribute to the amenity of centres but can have built form effects in need of management. Proposed changes to rule **LCZ-PREC1-PSP: R28**, allowing a restricted discretionary activity consent where the activity is not located on an identified active frontage as set out in the section 42A report will in my opinion enable this.
  - i) 53.312: I support additional height beyond was notified within the Local Centre zone to better maximise the capability of the land to accommodate intensive development and support this medium-to-large commercial node, although I recommend retaining a limited height in proximity to any residential or open space zone. This is reflected in revised standard **LCZ-PREC1-PSP: R40** (16m within 30m of a residential or open space zone, otherwise 24m) as attached to the section 42A report.
17. I am **neutral** or have no opinion either way on submission points 13.13; 38.40 & 38.53; 53.87; and 55.13, 55.14, 55.49, & 55.50, for the reasons set out in my technical report and/or as elaborated within the JWS. Specifically:
- a) 13.13: Childcare activities can support the functioning of small centres but I have no expertise on what if any size restrictions might be appropriate.
  - b) 38.40 & 38.53: The proposed subdivision provisions allow consideration of ecological areas and connectivity at the time of resource consent. In the meantime, the local centre has been appropriately positioned and placed, and I cannot imagine a superior solution for that. Repositioning it should only occur if there is



compelling evidence at this time concluding that unacceptable ecological effects will be unavoidable.

- c) 53.87: I have no expertise in ecological matters relating to private and/or public land.
- d) 55.13, 55.14, 55.49, & 55.50: I have no view on what I regard as matters of editorial preference that do not change the practical meaning or effect of the outcomes sought.

## **CONCLUSION**

- 18. On review of the PC5 material, I concluded that insofar as centres are concerned the proposal was at face-value logical and generally in-line with what I would describe as industry-norms. The relevant submissions have raised a number of matters for consideration. I have agreed with numerous points and the PC5 provisions proposed by the Council have been amended so as to incorporate changes that I am supportive of. In terms of section 32AA of the Resource Management Act 1991, I confirm that in urban design terms the changes proposed by the Council and as set out in Mr. Sharman's section 42A report will make PC5 superior to what was notified and enable a high-quality urban design outcome for the local and neighbourhood centres.
- 19. On the basis of the revised PC5 plan provisions attached to Mr. Sharman's evidence, I consider that the most appropriate urban design solution has been arrived at as it relates to the submissions and issues that I have been asked to review.

**Ian Colin Munro**

**2 September 2022**

## ATTACHMENT 1 – CV OF IAN MUNRO



# ianmunro

- › **strategic planning**
- › **urban development & growth frameworks**
- › **urban design advice and training**
- › **land use - transport integration**
- › **resource management & statutory policy making**
- › **consultation, facilitation, and public engagement**
- › **independent commissioner**

### CAREER SUMMARY

*Ian is a senior urban planner and urban designer who has had the opportunity to work across New Zealand including in all of the major centres and many of the provincial centres. Ian's background includes extensive resource management and an emphasis on basing solutions on the opportunities and realities of the circumstance.*

- › 2000-2001: Auckland City Council: planner
- › 2001-2005: North Shore City Council: planner / senior planner
- › 2005-2014: Urbanisimplus Ltd: urban designer / senior associate
- › 2014-present: Self-employed urban designer and planner

### KEY FACTS

- › Guest lecturer / tutor / professional teaching fellow, University of Auckland courses in planning and urban design annually since 2001.
- › Presenter / co-presenter, NZPI® annual urban design CPD courses since 2010, and direct training sessions with individual Councils.
- › Co-author, urban design chapter in *Planning Practice in New Zealand*, LexisNexis, 2017.
- › Contributor to numerous professional articles and conference presentations including NZPI® Planning Quarterly, Urban, NZJEL and IPENZ. Most recently co-presented an NZPI® e-seminar, 'In a Post-Covid 19 New Zealand, can we return to the local', April 2020.
- › Involved in over 2,000 planning proposals and has extensive experience with the resource management process across New Zealand.
- › As a hearings commissioner, has made or contributed to over 500 decisions on consent and plan change applications since 2007 for Auckland Council, Thames Coromandel District Council, Waikato District Council, Hutt City Council, Porirua City Council, and Queenstown Lakes District Council.
- › Member of Auckland Council Urban Design Panel since 2012.
- › Contributor to NZPI® award-winning projects: *Greater Christchurch Urban Development Strategy* (2008); Auckland City Council's *Liveable Arterials* (2009); Marlborough District Council's *Growing Marlborough* (2011); Christchurch City Council's *Sydenham and Lyttleton's master plans* (2012).
- › Lead author, RMLA award-winning *Best Practice Guideline for Urban Subdivision*, Kapiti Coast District Council, 2007.

### QUALIFICATIONS AND TRAINING

2013 - University of Auckland  
**Master of Transport Engineering Studies** (Hons).

2010 - University of Auckland  
**Master of Environmental Legal Studies** (Hons) (Fowlds Memorial Prize\*).

2005 - University of Auckland  
**Master of Architecture** [Urban Design] (Hons).

2003 - University of Auckland  
**Master of Planning** (Hons).

2002 - University of Auckland  
**Bachelor of Planning** (Hons) (Senior Scholar in Planning\*\*).

\* Most distinguished Masters / Honours student in the Faculty of Law

\*\* Most distinguished Bachelors student in the School of Planning

### PROFESSIONAL AFFILIATIONS AND ACHIEVEMENTS

2020 - Distinguished Service Award, New Zealand Planning Institute.

2005 → Full Member **New Zealand Planning Institute**.

2005 → Ministry for the Environment  
**Making Good Decisions RMA Certification**.

**ATTACHMENT 2 – TECHNICAL REPORT OF IAN MUNRO**

**26 AUGUST 2022**

**HAMILTON CITY COUNCIL  
C/- BECA PLANNING LTD  
ATTN.: CRAIG SHARMAN**

---

Dear Hamilton City Council

## **PLAN CHANGE 5 POST-SUBMISSIONS TECHNICAL EVALUATION: URBAN DESIGN (URBAN CENTRE) SUBMISSIONS**

### *Introduction and scope*

1. My name is Ian Munro and I am an urban designer. I have been involved in over 30 major greenfield plan changes across New Zealand and which include new networks of urban centres. I have particular experience in planning new urban centres including matters pertaining to location and sizing, zone configurations and extents, planning provisions, master planning, and development testing.
2. The Council has engaged me in a limited capacity to review and comment on submissions raising urban design issues relevant to urban centres within Plan Change 5 (“**PC 5**”), the area known as Peacocke. In respect of all other urban design matters, I understand that BECA Planning Ltd is addressing those.
3. I was engaged after the plan change had been publicly notified and was hence not involved in its preparation or accompanying technical reporting. I confirm that I was involved in providing advice to the Council on a sporadic basis when it was reviewing the previous Peacocke Structure Plan and plan provisions, including its overall development strategy, potential housing yields and scale, and potential urban centre networks and hierarchies. My understanding is that this was not formally part of what has become PC5.
4. I participated in an Expert Conference on 25 August 2002 involving planning, retail economics, and urban design experts. A Joint Witness Statement was produced and I am a signatory to that.

5. BECA Planning Ltd has identified the following submissions for me to consider:  
  
**Sub 1** – 1.7  
  
**Sub 13** – 13.12, 13.13  
  
**Sub 21** – 21.2, 21.3  
  
**Sub 22** – 22.1  
  
**Sub 38** – 38.40, 38.53  
  
**Sub 53** – 53.24, 53.25, 53.41, 53.44, 53.46, 53.48, 53.51, 53.57, 53.87, 53.90, 53.101  
  
**Sub 55** – 55.13, 55.14, 55.49, 55.50, 55.192, 55.251, 55.243, 55.249, 55.301, 55.312
6. To undertake my evaluation, I have read the Plan Change and its supporting documents; read the submissions I have been referred to; provided feedback to the Council on potential amendments to planning provisions and a proposed Peacocke Design Guideline; and attended (remotely) a meeting on 11 August 2022 held between representatives of the Council and Submitter 53, the Adare Company Ltd.
7. I have also been provided with information relating to the Council’s obligations under the National Policy Statement on Urban Development 2020 (“**NPS: UD**”) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**Enabling Housing Act**”). I have kept this in mind although note that the Enabling Housing Act’s provisions do not directly apply to land within the centre zones I have been engaged to consider.
8. At the time of this technical evaluation, I have relied on the plan provisions as they were at the time of public notification noting that although the Council is preparing an updated position and associated plan provisions, these have not yet been finalised or made available to me as the position of the Council.

*Evaluation of identified submissions*

**Submitter 1 – Glenview Club**

9. Point 1.7 states:  
  
*The text refers to the desired size of neighbourhood centres as being between 300m<sup>2</sup>- 800m<sup>2</sup>. This land area is too small to provide for meaningful urban design outcomes such as: outdoor dining areas, which attract people to stay for longer, and utilise the sport and active recreation land. landscaping, public art, common areas, pedestrian footpaths. Related Peacockes Objective NCZ-REC1 – PSP:03 seeks to achieve a attractive, high amenity area and encourages pedestrian focussed environments. Limiting the area of land zoned as Neighbourhood Centre does not promote this goal.*
10. I **disagree** with the submitter’s concerns. The relevant text within the proposed Plan provisions refers to a range of 300m<sup>2</sup> – 800m<sup>2</sup> GFA. This

refers to internal floor area, and would be exclusive of any outdoor dining areas, sport and active recreation land, landscaping, public art, outdoor and some indoor common areas, and pedestrian footpaths as identified by the submitter.

11. I have reviewed the proposed Plan provisions and do not agree that the quality of urban form outcomes sought could not be achieved within the proposed Neighbourhood Centre zones. In urban design terms centres best provide the social and economic focal point roles they perform for communities by being spatially focussed and 'compressed'. When an excessive extent of land is enabled, the result can be a number of spatially separated stand-alone retail outlets where customers may be more inclined to drive between retail 'pods' and it may not be possible to anchor buildings around a coherent public space.

### **Submitter 13 – Jones Lands Ltd**

12. Points 13-12 and 13-13 state:

*Submitter considers that provisions relating to 'dairies' are needed in the Medium Density Residential Zone and that should be encouraged to occur in those areas identified for a neighbourhood centre, and considers that the notified provisions undermine the viability of future neighbourhood centres.*

*The gross floor area restriction for childcare activities should be deleted as this unduly restricts the efficient use of such sites.*

13. As I understand the submitter, it seeks limitations on the ability of dairies to establish outside of neighbourhood centres, and that childcare activities should not be restricted in area.
14. I **agree** with the submitter's concerns relating to dairies. Neighbourhood centres are small-scale and their purpose is to provide a convenient cluster of small-scale commercial activities in a node so as to provide social, economic, and transport benefits that a community can directly associate with as a focal point. A dairy is possibly the most prevalent retail store type in neighbourhood centres across the country and is the origin of the proverbial 'corner store'.
15. A key challenge with securing retail within business centres is the tension between the locations within a neighbourhood that are the most central and accessible for the community intended to be served by the centre, and the locations that are the most visually exposed and accessible on the transport network, or in other words where a retailer interested in maximum sales (irrespective of whether the customer is local or not) might find most appealing. I would be concerned that there would be in several instances sites zoned Medium Density Residential adjacent to Neighbourhood Centres capable of enjoying superior business settings for a single retail store and where a dairy could locate instead of the centre.
16. As the submitter has identified, this could undermine the role and function of these centres.
17. I **recommend** that dairies should default to non-complying activity status along with other retail (MRZ-PREC1-PSP: R31) within the Medium Density Residential zone.

18. I have no opinion on the restriction for childcare activities, either way; this does not in my opinion relate to the urban design issues in centres I have been asked to consider. I do note however that I am aware of a number of large childcare centres within or at the fringe of centre zones (in both centre and residential zones), and do not see them as presenting any particular or inherent concern.

### **Submitter 21 – Transpower New Zealand Ltd**

19. Points 21.2 and 21.3 state:  
*Transpower opposes the Natural Open Space Zoning of the National Control Centre at 25 Hall Road, particularly given the anomaly of zoning part of the site Natural Open Space Zone given its existing use.*
- Transpower oppose the Medium Residential Zoning – Peacocke Precinct of the National Control Centre at 25 Hall Road.*
20. I **disagree** with the submitter. PC5 includes a framework for commercial development premised on a number of spatial principles. Of note there is a planned neighbourhood centre north, and another one south, of the submitter's site. These have been positioned based on generally minimising the number of centres needed to allow as much of the structure plan area as practicably possible to be within a walkable catchment of one. I agree with the logic of the PC5 centres network and see no obvious superior alternative. Neighbourhood centres provide convenience 'daily need' opportunities and hence they each tend to provide a similar type and range of businesses and amenities. In part because of this, people tend to travel to the nearest and most convenient one to them.
21. Re-zoning the submitter's site to Business 1 – Commercial Fringe zone would amount to addition of a commercial centre within the zone. Although the submitter may have no plan to develop commercial activities on the land, if it elected to move to an alternative site, it would be capable of accommodating business activities that would be capable of replicating and undermining the planned centres. Neighbourhood centres tend to be relatively delicate at the best of times because of their limited customer catchments, and a loss of a substantial part of an intended catchment would in my opinion have relatively significant and adverse effects on the land use framework proposed in the western part of Peacocke.
22. As far as I am aware, Transpower would retain existing use rights to continue operating its existing activity on its site irrespective of the zone that might result from PC5. At such future time as it seeks to vacate the Site, I can only consider that medium density residential activities would be the most appropriate use of the land, and that is what the proposed zone would enable.
23. I have no view on the exact extent of the Natural Open Space zone proposed as I understand that is primarily a function of ecological assessment and mapping, but in general terms I am supportive of it and would not see why it should not apply to this site in urban design terms noting it applies across the remainder of the structure plan area, and is a common type of constraint I see mapped on urban structure plans elsewhere.

## Submitter 22 – Woolworths New Zealand Ltd

24. Point 22.1 states:

*The submitter is concerned that the extent and placement of the Local Centre Zone will not result in an optimum outcome for the Local Centre in terms of amenity and efficiency. The submitter considers that the focal point of the Local Centre should be shifted further to the west and straddle the intersection of Peacockes Road and proposed east-west minor arterial road, so that the centre can benefit from the visibility and frontage provided by the intersection of two arterial roads, the activity levels of the proposed school, and the convenience of the proposed public transport hub. This will also allow separation of retail uses so that finer-grained retail, office, and entertainment activities are focused on the eastern side of Peacockes Road and the larger format supermarket can utilise the regular-shaped and flat land at 410 Peacockes Road. This corner site will enable the supermarket to be easily accessible by heavy vehicles (for deliveries of goods) and private motor vehicles (for customers), without compromising the focus on creating a pedestrian-friendly environment with active street frontages within the core area of the Local Centre.*

25. I **disagree** with the submitter and consider the relief sought would very adversely fragment the proposed centre.
26. Supermarkets are important anchors within local centres and generate substantial visitor trips that smaller-scale businesses seek to capitalise on. Configuring these in a coherent manner along a street is a key placemaking technique used in mainstream urban design practice (i.e., how to build a 'main street'). PC5 seeks a consolidated local centre outcome that provides for a supermarket as a fundamental part of the centre. Examples of recent urban centres that integrate high quality and pedestrian-focused areas with supermarkets, and which are in my opinion relevant comparators to the proposed PC5 local centre, include Hobsonville Village, Mangawhai Central, and Beachlands Village. There is in summary ample existing precedent for the outcome sought by PC5 and which in my opinion disproves the submitter's claim that accommodating the supermarket within the finer-grained / pedestrian focused retail part of the centre might undermine or compromise that.
27. The arterial roads will be significant barriers to cross and create semi-isolated commercial 'islands'. Instead of customers being able to conveniently move through a singular centre crossing only lower-speed local streets, which could involve them moving 'back and forth' between shops, splitting the centre across the arterials will make such casual movement much more inconvenient. Separating the supermarket visitors from direct exposure to the smaller-scale retail will also directly limit its market appeal, and likely result in retail operators instead looking to locate alongside the supermarket on the western side. My experience with similar proximate but separated retail areas has been that in many cases people choose to drive between car parks rather than walk back and forth (especially on wet weather days where standing in the rain waiting for a crossing signal would not appeal to many).
28. In my opinion this would not be in-line with the outcomes sought for the zone within PC5. I disagree that there is any inherent or practical inability for a supermarket, including its service and customer vehicle demands, to integrate sensitively into a high-amenity centre setting. My analysis of the proposed PC5 local centre is that it would be possible and practical to integrate a



supermarket in a successful way including but not limited to the location identified on the PC5 concept plan set out within Chapter 3 of the Plan provisions. Referring to the JWS produced on 25 August 2022, I am satisfied that two small to medium supermarkets could be accommodated within the notified zone area, in the event that two operators wished to compete and trade in the centre.

29. In reaching this conclusion, I accept that if a supermarket was considered as a stand-alone commercial use rather than as a key part of the local centre, then the Site identified by the submitter would be desirable for one.
30. I am also concerned that the local centre concept proposed in PC5 includes an important axial connection with the river and an opportune location for a high-amenity vista of that space. Achieving this will require a successful retail main street to be achieved that can stretch from the minor arterial intersection in the west to the river and proposed public gathering space / square. Based on generally observable street-based retail characteristics, the highest value and highest-quality retailing can be expected at the most accessible and prominent location. This would be the western intersection. I expect to see a 'decay' eastwards from that point, and the notional food & beverage precinct, public facility, and square can be seen as an attempt to create a destination to attract more people along the street. If a material portion of that retail was repositioned westwards there is a potential for the main street to 'run out of steam' before arriving at that eastern destination. That would in my opinion represent a substantial diminishment in the quality of the PC5 local centre outcome. This should be avoided, and it leads me to the view that if the Woolworths submission was accepted, restrictions should be imposed preventing retail activities other than a supermarket from locating on the western side of Peacockes Road.
31. For completeness, the proposed local centre will be adequately well-connected to the proposed school and passenger transport hub. Positioning a supermarket on the western side of Peacockes Road would not materially improve those connections.
32. I refer to the JWS produced at an Expert Conference on 25 August 2022 where I agreed that if the local centre was to be stretched westwards across Peacockes Road then it would be important for the design of at least that road, possibly the second minor arterial, and the intersection between them adjoining the notified local centre zone to be designed so as to balance through traffic functionality with pedestrian and place-making amenity. Even if such road redesign was to occur, my position is that the outcome would remain inferior to a coherent and consolidated centre on one side of Peacockes Road.

### **Submitter 38 – Director-General of Conservation**

33. Points 38.40 and 38.53 state:

*The local centre identified on the zoning map abuts Bat Priority Area. There is no discussion on how the local centre will be developed in a way that recognises this and ensures protection for Long-tailed bats and their habitat.*

*The Director-General appreciates that a suburban area as large as the PSPA will require a centre for retailing, offices, business and the like. That said, the proposed*

*Local Centre will abut a Bat Priority Area, a fact that has not been considered in the 'issues' paragraph, or the entirety of Chapter 6B. It is considered there should be a thorough discussion of how Neighbourhood Centres will be designed and located to avoid and minimise the impact on long-tailed bats.*

34. I **acknowledge** the submitter's concerns but see no evidence at this time to reconsider the proposed location of business centres within the zone. The business centre zones are not in my opinion any more or less likely to impact long-tailed bats than any of the other urban zones proposed within the area.
35. Furthermore, and particularly in terms of the proposed local centre, there are specific locational attributes that support the locations identified; it is not correct that they are capable of being positioned in any location or in any shape to suit other interests. In that respect the location of the centres proposed is in my opinion logical, justified and appropriate. I recommend that no changes to any of the business zone locations, shapes or extents should occur unless there is clear evidence that there was a real and significant likelihood of unacceptable adverse effects on long tailed bats arising.
36. That being said, only an ecological assessment could determine that either way and at a detailed level. Given that effectively all development within Peacocke, whether in a business centre or a residential zone, will require a subdivision consent (usually ahead of land use activities), it would be appropriate to ensure that any such necessary assessment and mitigation measures were identified and actioned at that point. I have to that end reviewed proposed Chapter 23A. Proposed policy SUB-PREC1-PSP: P19 appears to provide for this where it states "*...and ensure that the role, function and connectivity of ecological areas is maintained.*" The subdivision consent requirements and rules (i.e., rule SUB-PREC1-PSP: R24) in turn give effect to that. I am on this basis comfortable that any potential effects that development within the proposed business centre zones might have on the Bat Priority Areas.

### **Submitter 53 – The Adare Company**

37. This submitter has raised numerous points and I will comment on them generally on an individual basis.
38. Point 53.24 is:
- The "key design principles" for the Local Centre are listed under the Business Areas description in Chapter 3A but would be better included within the Peacocke Local Centre Design Guide in Appendix 1.4.10.*
39. I **disagree** with the submitter, although I do not consider that the key design principles are needed within the Plan at all (they are presented as neither objectives or policies, nor are they rules or assessment matters).
40. The key design principles are presented as high-level design 'starting points' for the Plan provisions. They are non-specific and broad concepts. They are best-suited within Chapter 3A to give plan-readers an overview of the planning approach and thinking for Peacocke. Conversely, the guidelines at Appendix 1.4.10 are more detail-orientated and better-suited for assessing an application for resource consent. It would not in my opinion promote better urban design outcomes to introduce general principles as design guidance.

By way of example, one of the design principles in Chapter 3A states: “the block pattern and lot arrangement should create streets that are lined with buildings, with public frontages...”, in a very general way. This can be contrasted with design criteria 7, which states, in a specific and more “assessable” way:

7. *Design façades that activate the street frontage, providing an attractive and safe street by:*
  - a. *Establishing the primary customer access to the main street.*
  - b. *Locating service and loading areas to the rear of the building.*
  - c. *Having at least 75% of the ground floor wall facing the street or public place of clear glass capable of displaying goods and services to passing pedestrians where Primary Frontages are identified.*
  - d. *Having at least 50% of the ground floor wall facing the street or public place of clear glass capable of displaying goods and services to passing pedestrians where Secondary Frontages are identified.*
  - e. *Ensure architectural detail and glazing is continued into the upper floors, avoiding blank facades throughout the main street.*
  - f. *Including a continuous veranda that provides shelter and shade to pedestrians no less than 2.5m.*
  - g. *Not locating parking within identified primary frontages.*

41. Point 53.25 is:

1. *The inclusion of the Peacocke Local Centre Design Concept in Chapter 3A creates confusion given Figure 2-3b in Appendix 2 includes a different diagram entitled Peacocke Local Centre Concept.*

2. *The current notation of the main street as “Pedestrian Main Street” on the Peacocke Local Centre Design Concept diagram implies that the main street will be pedestrianised with no vehicles. The submitter understands that is not the intention and that the main street will be used by vehicles, pedestrians and cyclists, which is a supported outcome. The importance of providing good pedestrian facilities within the main street environment can be addressed in the Peacocke Local Centre Design Guide (Appendix 1.4.10).*

3. *The Peacocke Local Centre Design Concept diagram refers to “Fine Grained Retail” which is not a term which is either defined or commonly understood. The description should be replaced with “Retail, Offices, Restaurants, Licensed Premises and Food and Beverage” which are all terms that are defined in the district plan. The size and scale of retail activities is managed by other provisions.*

4. *The Peacocke Local Centre Design Concept diagram identifies unlabelled uses which are shown in yellow on the diagram. The absence of any notation for these uses creates uncertainty and ambiguity. These areas, which are on the periphery of the Local Centre, are likely to be suited for commercial and high density residential activities.*

5. *The diagram identifies a “Food and Beverage Precinct”. Although this is one location which is well suited for food and beverage activities, rather than concentrating all food and beverage activities within a precinct, it is more appropriate that food and beverage activities are interspersed throughout the Local Centre. This*

should be reflected in the diagram by changing the notation so that the anticipated range of potential uses is stated.

6. The Peacocke Local Centre Design Concept diagram identifies "Large Format Retail" in the location where it is currently intended that a supermarket would be established. The importance of a supermarket to anchor the Local Centre Zone is addressed in LCZ-PREC1- PSP: O2. Supermarket is a defined term in the district plan so the diagram should expressly refer to the term "Supermarket" rather than "Large Format Retail".

7. The report entitled 'Community Infrastructure in Peacocke' concludes that short to medium term demand for libraries and community centres will be met by existing facilities elsewhere and that there is no funding certainty for a possible long-term library and community centre. The Peacocke Local Centre Design Concept diagram should reflect alternative uses given uncertainty exists whether there will ever be a need for a library and community centre in Peacocke.

8. The location of the Local Centre is supported subject to amendments being made to shift the northern boundary of the Local Centre to the south (a reduction of approximately 7,600m<sup>2</sup>). The purpose of this change is to achieve better alignment with updated plans for high density residential use that the submitter has developed for this part of the Amberfield site. The submitter plans high density residential uses for the area that currently forms the northern extent of the Local Centre. The proposed change will not affect the capacity of the Local Centre to accommodate retail, commercial and other uses at the required scale to service the local needs of the Peacocke Structure Plan area.

42. Applicable to all of my responses below is that I understand the concept plan is not proposed as a rule in the Plan, but instead a matter of context to help explain the Council's thinking. It would have a practical role in informing applicant and Council decisions however because the supporting text does indicate that the Council's intent is for something generally in accordance with that concept to be delivered. In that respect I have interpreted it as a form of assessment matter or guideline that might be consulted through a resource consent process. Following on from that, I would be supportive of it and its text also being placed within the formal design guideline Appendix.
43. I **disagree** with the submitter in terms of point (1). The two diagrams show different levels of detail, with the Appendix 2 diagram more of a schematic, and the Chapter 3A diagram more of a concept plan. But they are consistent with one another and I see no basis on which a reasonable person with a grasp of the facts would become confused.
44. I **agree in part** with the submitter in terms of point (2), and **recommend** that diagram item (a) should be titled "Pedestrian-orientated main street".
45. I **agree** with the submitter in terms of point (3), and **recommend** that item (g) should be re-named "retail orientated to the street", which is what I consider is the point of the diagram.
46. I **agree** with the submitter in terms of point (4), and **recommend** that a new label, "J" be added to the yellow-coloured shapes with a notation "commercial or high density residential".
47. I **disagree** with the submitter in terms of point (5). The term 'food and beverage precinct' does not indicate that that is the only location appropriate for any food and beverage activities, and instead speaks to the potential for a

cluster of bars and restaurants of cafes to enjoy a north-facing, river-view, and quieter (away from the arterial roads) setting. Proximity to the public plaza would allow events and outdoor dining in a very complementary manner. In summary the concept plan is logical and I cannot agree with the submitter's criticisms.

48. I **agree in part** with the submitter in terms of point (6). The notation 'large format retail' is correct in explaining the built form typology shown on the diagram but reading the Plan provisions as a whole makes clear that, based on the concept plan, that is where a supermarket would need to locate. Although I am not convinced that this is the only location that a supermarket could successfully locate, it would be one workable solution and I would not oppose it. I **recommend** that the notation on the orange-coloured box be deleted and replaced with a letter "K", supported with new text in the legend "supermarket or large format retail".
49. I **agree in part** with the submitter in terms of point (7). Although my assessment is that the location identified on the concept plan would be optimal for a community facility, unless the Council is able to commit to designating or acquiring land for that purpose over the long term, it would be difficult to require a private landowner to retain land in trust until such time as the Council made a determination on the matter. Absent that, it would be most appropriate, and I **recommend**, to notate that as "potential community facility". The word "potential" would in my opinion make it clear that this was one possible outcome at that location, not a firm requirement.
50. I **disagree** with the submitter in terms of point (8). The centre is in many respects fixed by the importance of its main street aligning with the key arterial intersection immediately west. This in turn creates a need for centre-zoned land either side to provide for development, parking and supporting centre activities. I am supportive of the currently proposed zone and am not convinced that reducing the zone is an appropriate solution, especially if it undermines the role and function of the northern side of the future main street.
51. Point 53.41 is:
- A new rule is sought requiring that commercial activities which exceed 800m2 gross floor area total within each Neighbourhood Centre require resource consent as a Non- Complying Activity. The commercial activities which should be captured by this rule include the activities covered by Rules R4-R11, R13, R15-R17, R23, R25, R28-R38 and R40. The purpose of this new rule is to ensure that the scale of commercial activities within each centre is strictly limited to avoid undermining the viability, vitality and amenity of the Local Centre and other Neighbourhood Centres. The proposed rule will assist in achieving the outcomes envisaged in Chapter 3A.*
52. I **agree** with the submitter. The Council's evidence base is that the scale of individual neighbourhood centres should not generally exceed 800m2, not that any individual activity within a centre should (i.e., the Plan intent is not that there be 5 x 800m2 outlets within a neighbourhood centre). I **recommend** that the submitter's alternative rule be accepted.
53. Point 53.44 is:
- A Floor Area Ratio standard is unnecessary as bulk and location of buildings in the Neighbourhood Centre Zone is suitably addressed through other standards such as building height. The scale of commercial development in neighbourhood centres*

would be more effectively addressed by a rule imposing maximum floor areas for commercial activities within the Neighbourhood Centres.

54. I **agree** with the submitter. A FAR control is in urban design terms excellent at providing flexibility in building bulk and location while providing the certainty as to an overall limit on development quantum likely. In a planning regime where bulk and location controls are already separately provided for, I see it as unnecessary and ineffective. I **recommend** that the submitter's relief be accepted.

55. Points 53.46 and 53.57 are:

*There are no specific signage standards for the Neighbourhood Centre Zone. It appears that the absence of applicable signage standards is an oversight. It would be appropriate to adopt the existing signage standards which apply to other business zones in the City for the Neighbourhood Centre Zone.*

*There are no specific signage standards for the Local Centre Zone. It appears this is likely to be an oversight. It would be appropriate to adopt the existing signage standards which apply to other business zones in the City for the Local Centre Zone.*

56. I **agree** with the submitter and **recommend** its relief be accepted. It would be inefficient and unnecessary to develop a Peacocke-specific management regime for signage.

57. Point 53.48 and 53.51 are:

*Structure Plan Figure 2-3b identifies Primary and Secondary Frontages within the Local Centre. In these areas it is important to maintain the continuity of commercial frontage and streetscape. Outside of these areas, depending on the uptake of commercial development and design factors, it is more appropriate to maintain flexibility to have residential activity at ground level. This flexibility is better provided for by a Discretionary Activity than a Non-complying Activity Status.*

*Structure Plan Figure 2-3b identifies Primary and Secondary Frontages within the Local Centre. In these areas it is important to maintain the continuity of commercial frontage and streetscape. Outside of these areas, depending on the uptake of commercial development and design factors, it is more appropriate to maintain flexibility to have residential activity at ground level. This flexibility is better provided for by a Discretionary Activity than a Non-complying Activity Status.*

58. I **agree in part** with the submitter. Commercial centres, including their back-streets, are more than just opportunities for commercial activity. The presence of high volumes of pedestrians and other traffic can create practical nuisances and privacy issues that undermine residential amenity. In turn, dwellings permitted at the ground level may seek to re-claim privacy such as by being set back behind large yard setbacks or through erection of other barriers such as walls and fences. This can then undermine other built forms sought for streets.

59. In my experience I have worked on perhaps a dozen applications for land use consent to establish residential activities at the ground floor of buildings within centre zones (PC5 adopts a relatively industry-wide approach in this respect). All have been granted. I am on that basis confident that if a compelling argument was made to use part of the proposed centre zone for non-business ground floor activities, it too would be granted. But on further reflection it

occurred to me that my past experiences all shared common characteristics. These included that:

- a. The activities were occurring at the outer fringe of the centre zone, adjacent to residential activities.
  - b. The activities did not occur along a main street or arterial road frontage within the zone. They were in locations within the local context where they were separated from the principal focus of activity, and where it was difficult to see fundamental movement flows changing to the extent that land not attractive to street-based commercial use now would become so (i.e., they were on back streets). This is analogous to the primary and secondary streets identified by the submitter.
  - c. The proposals were supported by economics analysis establishing that there was no reasonably foreseeable need for the land in question to meet the commercial needs of the community.
  - d. Residential density within the centre zone should at least be equivalent to the minimum density that the closest residential zone would require.
60. I would not be opposed to a consent opportunity and activity status other than a non complying activity if the above were catered for, and I would agree that it would provide a degree of practical recognition that in between the high-level of a plan change and the detail of a subdivision plan there are commonly some 'rough edges' that arise at zone boundaries.
61. This would go some way towards the relief sought by the submitter but my preference is that it focus at the outer edge / fringe of the zone.
62. Point 53.87 is:

*The Ecological Rehabilitation Management Plan should relate to ecological rehabilitation and management within public areas only rather than within private lots. A distinction must be drawn between what is mitigation for a proposed activity and what is wider protection and enhancement responding to a city-wide issue. The provisions should be clear as to which public areas the Ecological Rehabilitation Management Plan should apply. An Ecological Rehabilitation and Management Plan should not be required where public land does not exist, nor is proposed or required for a particular site. Rehabilitation and management should take place on public land and the cost of preparing an Ecological Rehabilitation and Management Plan should not be transferred to individual private landowners. Clause (iii) of Appendix 1.2.2.25 should be deleted. Requiring fixed lighting design to be provided for private lots near areas of Significant Bat Habitat is impractical at subdivision stage. It is also unnecessary given there are proposed land use controls which limit light spill into Bat Habitat Areas (Rule 25.6.4.4) and which require 5m building setbacks to the boundary of Bat Habitat Areas (Rule MRZ-PREC1-PSP: R39(8)). Clause (iv) should be amended by adding the words "as relevant to the site". This reflects that wetland restoration, for example, will only be relevant to sites which contain wetlands. Clause (v) relates to the establishment and enhancement of identified "Significant Bat Habitat corridors" and should be deleted for the following reasons:*

- *Hamilton City Council should take leadership on the provision of the Bat Habitat Areas by purchasing the affected land and being responsible for their creation and maintenance.*

- *It is an unreasonable burden to require the limited number of owners of land that is subject to the Bat Habitat Areas to be responsible for their creation, which is likely to require extensive planting and other improvements at significant cost under the direction of ecological and landscaping experts.*
- *The Bat Habitat Areas are for the mitigation and compensation of effects on bats across the Hamilton city home range and the Peacocke Structure Plan area and they will also have community recreation benefits. Therefore, the burden for their creation should be shared.*
- *The Bat Habitat Areas straddle property boundaries. The purchase of the land and the creation of the Bat Habitat Areas by Hamilton City Council would ensure a coordinated approach, allow greater control over the timing of their provision and be more equitable.*

63. I am **neutral** on this matter as it is one primarily relating to ecological effects.

64. Point 53.90 is:

*1. The Peacocke Local Centre Design Guide is repetitive, not well structured, misses clarifying diagrams and uses incorrect terminology to reference the Peacocke Local Centre Concept Plan in Appendix 2.*

*2. Point 12 under the heading 'Main Street' refers to parking in a general sense and requires that, where provided, it must be located to the rear of sites. The provision of on-street car parking will be very important for the commercial visibility and functioning of the Local Centre. The guide should be clear that the reference to parking being at the rear of sites applies to off-street parking only.*

*3. The 'key design principles' for the Local Centre are listed under the Business Areas description in Chapter 3A but would be better included within the Peacocke Local Centre Design Guide in Appendix 1.4.10.*

65. I **agree in part** with point (1). Although I find the design guideline workable and sufficiently clear for its purpose, it does (much like the balance of the District Plan) contain a great deal of supporting explanation and rationale. It would be possible to significantly simplify the guideline and I would not oppose this.

66. I **agree** with point (2) and **recommend** that the submitter's relief be accepted.

67. I **disagree** with point (3) as discussed earlier. I also note that adding more material to the guideline would not be at first-glance consistent with the submitter's desire to see the guideline streamlined.

68. I am aware that the guideline is in the process of being revised but this has not yet been completed.

69. Point 53.101 is:

*The location of the Local Centre Zone is supported subject to amendments being made to shift the northern boundary of the Local Centre Zone to the south (a reduction of approximately 7,600m<sup>2</sup>). The purpose of this change is to achieve better alignment with updated plans that the submitter has developed for this part of the Amberfield site. The submitter plans high density residential uses for the area that currently forms the northern extent of the Local Centre Zone. The proposed change will not affect the capacity of the Local Centre to accommodate retail, commercial and other uses at the required scale to service the local needs of the Peacocke Structure Plan area.*



70. I **disagree** with the submitter, for the reasons set out earlier.

**Submitter 55 – Kainga Ora**

71. This submitter has raised numerous points and I will comment on them generally on an individual basis

72. Points 55.13 and 55.14 are:

*Kāinga Ora considers that the objective could be clearer as to the role of the centres and the outcomes that will be delivered*

*Kāinga Ora considers that the objective could be clearer as to the role of the centres and the outcomes that will be delivered.*

73. I am **neutral** on these points.

74. Points 55.49 and 55.50 are:

*Kāinga Ora generally supports this policy to the extent that additional land for a centre is likely required to support the higher densities promoted by Kāinga Ora.*

*Kāinga Ora generally supports this policy to the extent that additional land for a centre is likely required to support the higher densities promoted by Kāinga Ora.*

75. I am **neutral** on these points.

76. Point 55.192, and 55.251 are:

*Kāinga Ora generally supports this section but considers that it should be renamed 'Purpose' with amendments to the wording to better reflect what the NCZ means to Peacocke.*

*Kāinga Ora generally supports this section but considers that it should be renamed 'Purpose' with amendments to the wording to better reflect what the NCZ means to Peacocke. These comments on this chapter are notwithstanding Kāinga Ora's overall position that the centre type will need to be reviewed following an assessment of the density targets and the consequential catchment.*

77. I **disagree** with the submitter. Although the proposed text changes are largely a matter of editorial preference, the status of the provision as a statement of explanation or intent is in my opinion clearer and more meaningful as proposed by the Council. The Council text focuses on introducing the concept of a centre and the centres hierarchy is in my opinion helpful in aiding the understanding of non-experts as to why the Council places so much importance on centres.

78. Point 55.243 is:

*Kāinga Ora supports more height in the NCZ both to distinguish it and allow for residential above the commercial.*

79. I **agree** with the submitter and recommend its relief be **accepted**. The additional height sought will better-differentiate the neighbourhood centres from the residential zones around them, provide additional housing choice in community focal points well-served by convenience amenities.

80. Point 55.249 is:

*Kāinga Ora considers that the development standards applying to residential development are too restrictive and do not achieve the vision for the precinct, particularly considering the Neighbourhood Centre Zone will be complemented with adjoining / nearby open space.*

81. I am **neutral** on this point, but I note that as a result of the Enabling Housing Act, residential development would be able to achieve relatively high densities at 3-storeys tall adjacent to the centres. This appears to go some way towards the relief sought.

82. Point 55.301 is:

*Kāinga Ora considers that commercial places of assembly are a normal part of local centres and should be permitted.*

83. I **agree in part** with the submitter. The urban design challenge that commercial places of assembly bring is their often large car parking requirements and functional building forms (not unlike large format retail or a supermarket). But assuming that those could be managed, the contribution they could make to the amenity and vibrancy of a local centre is positive and accepted. I **recommend** that commercial places of assembly, including cinemas and bowling alleys, be a restricted discretionary activity, restriction of discretion as per the submitter's requested relief and with the addition of an assessment matter seeking that large at-grade car parks be avoided by providing car parking within buildings.

84. Point 55.312 is:

*Kāinga Ora supports more height in the LCZ both to distinguish it and allow for residential above the commercial.*

85. I **agree in part** with the submitter. The local centre will be the principal focal point for Peacocke and building heights, both to maximise density as well as visually reinforce its importance in the wider 'townscape' should be maximised. The 24m sought by the submitter would notionally accommodate 6 to 7-storey buildings and in consideration of the scale of Peacocke as a growth area, the location of the local centre zone relative to sensitive receivers, and its own characteristics, this would not be likely to create significant or concerning urban design effects. However, while I have some comfort with 24m tall buildings, especially at the western end of the main street adjoining the arterial road intersection (where the buildings could form a positive visual termination of the east-west arterial road axis in particular), I am not convinced that this would be appropriate at the eastern edge of the centre given the proximity of the river and Bat Priority Area. I have a similar discomfort at the northern and southern residential zone interfaces of the zone (the southern edge in particular). I **recommend** that the submitter's relief be accepted except that land within 30m of a residential or open space zone be subject to a 16m height limit. This outcome would also reinforce the greatest heights within the middle of the zone and main street, rather than potentially at its outer (eastern) edge.

Please feel welcome to contact me should you wish to discuss any aspect of the above further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ian Munro', with a long horizontal line extending to the left.

**IAN MUNRO**

urban planner and urban designer

B.Plan (Hons); M.Plan (Hons); M.Arch [Urban Design] (Hons); M.EnvLS (Hons); M.EngSt [Transport] (Hons); MNZPI

(e) [ian@ianmunro.nz](mailto:ian@ianmunro.nz)

(m) 021 900 993