

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 MICHAEL RICHARD GRAHAM
(LANDSCAPE AND VISUAL)**

Dated 2 September 2022

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INTRODUCTION

1. My full name is Michael Richard Graham.
2. I am a director at Mansergh Graham Landscape Architects (MGLA) and have been in this position since 2002. I hold the qualifications of a Bachelor of Science in Philosophy (from Canterbury University, Christchurch) completed in 1990, and a Bachelor of Landscape Architecture (from Lincoln University, Canterbury), completed in 1992. I am a qualified Landscape Architect and a registered member of the New Zealand Institute of Landscape Architects.
3. I have prepared several district-wide landscape studies and have provided advice to various councils on the preservation of landscape character, urban design and growth strategies for both rural and urban areas. I am a current member of the Hamilton City Urban Design Panel and have been a sitting member since its inception in 2008.
4. In July 2021, I provided a report to Hamilton City Council (**HCC**) undertaking a review of the spatial resolution of the proposed Peacocke Structure Plan Precinct (**PSPP**) from a landscape architectural perspective, in response to the identification of a change in the extent of land that is available for residential development, arising under the proposed Plan Change 5 to the Operative Hamilton District Plan (**PC5**). That report is Appendix O to PC5.
5. I have provided a further technical report to HCC dated 31 August 2022 which addresses submissions received on PC5 and provided recommendations arising from those submissions. A copy of that further technical report is set out at **Attachment 1** to this statement of evidence.

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.

SCOPE OF EVIDENCE

7. In this statement of evidence, presented on behalf of HCC as proponent of PC5, I provide a summary of the findings in my technical reports of July 2021 and August 2022, and respond to matters raised in submissions and comment on the updated PC5 provisions.

EXECUTIVE SUMMARY

8. In my original technical report, I developed a refined structure plan for HCC to accommodate the change in extent of land available for residential development as a result of further information provided at that time in respect to infrastructure requirements (roading and stormwater), ecological habitat and geotechnical hazards. That refined structure plan, which focussed on landform retention, gully enhancement and the integration of urbanisation adjacent to ecologically significant habitats, was incorporated into the notified version of PC5.
9. Since preparing that structure plan I have considered the submissions received in relation to PC5 and have prepared a further technical report dated 31 August 2022 which provides a summary of matters raised in submissions in relation to landscape architectural matters.

10. With respect to the changes to the notified plan change as result of the adoption of the Medium Density Residential Standards, I do not consider they have had any relevant effect on the landscape character and amenity aspects of PC5.
11. Overall, having regard to the matters raised in submissions, I support the inclusion of the preservation of natural character as a specific objective with regard to the Mangakotukutuku Gully system and the Waikato River in accordance with section 6(a) of the RMA.
12. I support amendments to Appendix 1.2 Information Requirements to clarify when any new subdivision and land development would require the preparation of a Landscape Concept Plan for any open space included within that development.

TECHNICAL REPORTS

13. In November 2019, MGLA were engaged by HCC to undertake a review and spatial resolution of the proposed PSPP. This review was in response to the identification of additional areas of land that were now unavailable for residential development. The change in the extent of land available for residential development was because of further investigations that were undertaken and changes in policy with regard ecological habitat, areas of geological hazard and refinement of the road network and stormwater infrastructure.
14. Analysis of that information, in consideration of landform and land cover, led to the development of a revised Structure Plan that responded to the implications of that information and reflected potential development scenarios for its integration. Consideration of opportunities for localised increased density of development were also undertaken, with the density informed at that time by the context of the Operative District Plan.

15. In addition to the spatial refinement of the structure plan, preliminary guidance was also prepared on landform retention, gully enhancement and the integration of urbanisation adjacent to ecologically significant habitats.

RESPONSE TO SUBMISSIONS

16. Seven submissions were received with respect to landscape matters. The submissions focussed on the following issues:
 - a) The inclusion of the preservation of natural character as a specific objective with regard to the Mangakotukutuku Gully system and the Waikato River in accordance with section 6(a) of the RMA and potential implication of earthworks.
 - b) Amendments to Appendix 1.2 Information Requirements to clarify when any new subdivision, including land development application, requiring the preparation of a Landscape Concept Plan for any open space included within that development.
 - c) And thirdly amendment of the wording of the Vision Statement and the development of design guidelines but referenced as an advice note against the relevant rules and standards, to allow them to be updated without going through a Schedule 1 RMA process.
17. Waikato Regional Council (**WRC**) Submission Number 36, subpoint 36.30 sought the inclusion of a new policy to cover natural character within Chapter 3 – Structure Plans, and an additional policy providing direction around preservation of natural character of the Mangakotutuku Gully system and Waikato River margins; to restore natural character where compromised. In part this submission seeks to align PC5 with Waikato Regional Policy Statement (**WRPS**) Policy 12.2. and Objective 12.2.2. which seeks restoration of natural character where it has been compromised.

18. From a landscape and character perspective I consider that subpoint 36.30 is appropriate and captures section 6(a) of the RMA, specifically “preservation of the natural character of...wetlands, and lakes and rivers and their margins...”, inclusive of natural elements, biophysical, perceptual and experiential aspects of an area. I note there is a high degree of overlap with the identified ecological areas of the Mangakotukutuku Gully and the Waikato River and margins. I also note the protection afforded by their identification as SNAs, Significant Bat Habitats and protected within the Natural Open Space Zone. I considered, however the inclusion of a policy specifically directed to preserving and, where practical, enhancing the natural character of these features, including the perceptual and experiential qualities, would be beneficial.
19. I therefore suggested that, from a landscape character and amenity perspective that a reference to natural character could be included in DEV 01-PSP-011 and/or DEV 01-PSP-P24.
20. WRC Subpoint 36.57 requests an amendment to Chapter 25.2 Earthworks and Vegetation Removal; Objective 25.2.2.2, Policy 25.2.2.2a wording, (or the addition of a new policy), to maintain the hydrology of the PSPP and protect the natural character of the Waikato River, natural water course and wetlands from the impact of earthworks and vegetation clearance.
21. From a landscape perspective, while I acknowledge the general protection of Objective 25.2.2.2 -2, I am in agreement with subpoint 36.57. Hydrology is an implicit aspect of natural character and the potential for hydrological effects as a result of earthworks are a key component within Chapter 25.2.
22. I suggested the following policy, or something similar, be added to Objective 25.2.2.2:

Earthworks shall occur in a way that preserves the natural character, including hydrology, of the Mangakotukutuku Gully and Waikato River margins.

23. Since the preparation of my technical report, I have read and acknowledge the joint witness statement (JWS Planning 2 26 Aug 2022; Earthworks, Attachment 1), and the positions that the planners have reached through expert conferencing. With respect to the positions reached I support that outcome as it does not erode the protection afforded previously.
24. Submission 46, subpoint 36.30 and Submission 53, Subpoint 53.86 are identical submissions seeking changes to the wording of the first two paragraphs of Appendix 1.2 Information Requirements Appendix 1.2.2.24, Landscape Concept Plans Peacocke Structure Plan Area.
25. The submissions seek to remove the requirement for the preparation of a Landscape Concept Plan for subdivision on private land which is adjacent to or includes any open space zone or involves more than two hectares of land.
26. I consider there are two distinct aspects to this submission which are dependent on the location of any open space zone relative to the proposed submission. I do not support the removal of the requirement for the preparation of a Landscape Concept Plan where a subdivision includes an open space zone. Given that almost all the Peacocke growth cell is currently in private ownership, this landscape provision must apply to private land that is being subdivided.
27. I am however in agreement with the removal of the requirement where the open space zone is adjacent to the subdivision. I consider the deletion of that requirement is appropriate as that land is not included in the development and sufficient consideration of adjacent areas is captured in Section 1.2.2.2.1. Additional Requirements for Concept Plans for the Peacocke Structure Plan.

28. Section 1.2.2.2.1. requires a demonstration of the response to adjacent contexts with regard to i) Transport Network, iii) Natural Environment, iv) Open Space Network, v) Land Use and vi) detailed Development Response.
29. Submission 55, subpoint 55.3 seeks the introduction of an additional overlay into Appendix 17 – Planning Maps, an ‘Earthworks Overlay’. The intention of this overlay is to indicate those areas of the Precinct where more sympathetic earthworks are required to respect the natural topography of the land. It is suggested that an overlay would enable developers and purchasers to understand the implications of potentially restricted earthworks, including costs to develop or limitations on development density.
30. I am not in agreement with this subpoint. From a landscape perspective it is recognised that medium density residential development will have an impact on the existing landscape topography, specifically that there will be a need for earthworks. This is an expected concomitant of urbanisation. I note that the significant landscape features are already identified and protected within the Structure Plan Precinct and they are not located within the Medium Density Residential Zone. In addition I consider earthworks are sensitive to both layout and approach and are typically evaluated as part of subdivision design due to the variables involved. I consider earthworks guidance is sufficiently addressed within Chapter 25.
31. I therefore consider that an earthworks overlay is not an appropriate response in this instance.
32. Submission 55, subpoint 55.5 proposes the amendment to Chapter 3A Peacocke Structure Plan; Vision. This subpoint proposes amendments to the Vision statement and supports the development of a list of specific matters that should be included as matters of discretion and assessment criteria on design outcomes. It recommends that any design guidelines are

considered as non-statutory documents but referenced in an advice note against the relevant rules and standards. This allows them to be identified as best practice guidance while being able to be updated without going through an RMA Schedule 1 process.

33. I consider that the proposed amendments assist in conveying the vision of the Peacocke Structure Plan and provide a useful framework for the consideration of design guidelines as non-statutory documents. I am in support of this submission.
34. Submission 55, subpoint 55.400 addresses only the first paragraph of Appendix 1.2 Information Requirements; 1.2.2.24, Landscape Concept Plans Peacocke Structure Plan Area. It proposes that the phrase 'or land development' is included in addition to subdivision application, as a trigger for the requirement of a Landscape Concept Plan. This change reflects a more comprehensive response to considering the effects of land development that may occur as a prelude to subdivision.
35. I agree with this suggested amendment as it increases broader consideration of developments that may impact opportunities and constraints for integration within the Peacocke Structure Plan Area.

UPDATED PC5 PROVISIONS

36. With respect to the changes to the notified plan change as result of the adoption of the Medium Density Residential Zone Standards, I do not consider they have any relevant effect on the landscape character and amenity aspects of PC5.

CONCLUSION

37. I consider PC5 has provided objectives, policies and rules consistent with the intent of the refined Peacocke Structure Plan, and notwithstanding the

supported subpoints I have identified in my evidence, the PC5 provisions are consistent with the general intent of the preliminary integration strategies identified my technical report.

Michael Richard Graham

2 September 2022

ATTACHMENT 1



Project: Plan Change 5 Peacockes Stucture Plan: **Memo:** One **Page:** 1 of 7

Topic: Landscape Architectural Technical Report

Date: 31 August 2022

Attention: Craig Sharman, Brianna Morrison – Beca

From: Michael Graham

Introduction

Mansergh Graham Landscape Architects Ltd (MGLA) have been engaged by Hamilton City Council to provide expert landscape advice on the proposed Peacocke Structure Plan Precinct (PSPP); Plan Change 5 (PC5). The purpose of PC5 to set out how the PSPA will be developed from *General Residential Zone* and *Peacocke Special Character Zone* to *Peacocke Medium Density Residential Zone* in addition to provisions to accommodate transport connections, community spaces, areas of cultural heritage and protection of areas of the natural environment.

The scope of this report is limited to:

- a. A summary of the matters contained in my original report;
- b. An assessment of the issues raised in submissions relevant to my professional practice, and my recommendation in respect to the submission points.

Peacocke Structure Plan Review Report Summary

In November 2019 MGLA were engaged by Hamilton City Council to undertake a desk top review and spatial resolution of the proposed PSPP. This review of the PSPP was in response to the identification of additional areas of land that were now unavailable for residential development. The change to the extent of land available for residential development occurred as a consequence of further investigation and/or changes in policy with regard ecological habitat, areas of geological hazard and refinement of the road network and stormwater infrastructure.

Analysis of that information in consideration of landform and land cover led to the development of a revised *Structure Plan* iterations that responded to the implications of that information and reflected potential development scenarios for its integration. Consideration of localised increased density of development were also undertaken, informed at that time in part by the context of the operative district plan. In addition to the refinement of the spatial structure plan, preliminary guidance was also prepared on landform retention, gully enhancement and the integration of urbanisation adjacent to *ecologically significant habitats*.

Summary Of Relevant Submissions Received and Recommendations

A limited number of submission sub points (7) pertinent to landscape character, amenity and natural character were received with respect to the *Plan Change 5 Peacocke Structure Plan*. The issues raised, comments where applicable, and recommendations, considered from a landscape character and amenity basis follow below. They are set out based on submission number and then sequentially for the subpoint. Where two submitters address an identical issue the two submission numbers, identifying information and subpoints are listed sequentially before issue, comment, and recommended action.



A summary table of the pertinent landscape character, amenity and natural character submissions is attached to this memorandum.

Submission Number 36

Waikato Regional Council

Chapter 3- Structure Plans

Subpoint 36.30; Include new policy to cover natural character.

Addressing *natural character* of wetlands, lakes, rivers, and their margins is an important part of achieving s6 RMA and in giving effect to Waikato Regional Policy Statement (WRPS) Policy 12.2. The WRPS objective 12.2.2. is particularly relevant for structure planning as it seeks restoration of *natural character* where it has been compromised. An additional policy providing direction around preservation of *natural character* of the *Mangakotutuku Gully [System]* and *Waikato River* margins and direction to restore *natural character* where compromised would provide improved consistency with these directions.

Comment

From a landscape character and amenity perspective, I support *subpoint 36.30* as it captures the RMA Section 6(a) *preservation of the natural character of ...wetlands, and lakes and river and their margins...* inclusive of natural elements, biophysical, perceptual and experiential aspects of an area. I also consider there is a high degree of overlap with the identified ecological areas of the *Mangakotutuku Gully and the Waikato River and margins* and while these aspects are also captured by their identification as *SNAs, Significant Bat Habitats* and protected within the *Natural Open Space Zone*, I consider the inclusion of a policy specifically directed to preserving and enhancing the *natural character* of these features, including the perceptual and experiential qualities, would be beneficial.

As a consequence, from a landscape character and amenity perspective I would suggest some reference to natural character could be included in *Dev 01-PSP-011* and *Dev 01-PSP-P24*.

Chapter 25.2 Earthworks and Vegetation Removal

Subpoint 36.57; Objective 25.2.2.2 Policy 25.2.2.2a

Sub point 36.57 requests an amendment to *Policy 25.2.2.2a* wording, (or the addition of a new policy), to maintain the hydrology of the PSPA and protect the *natural character* of the Waikato River, natural water course and wetlands from the impact of earthworks and vegetation clearance.

Comment

From a landscape character and amenity perspective, I support *subpoint 36.57* as it captures the RMA Section 6(a) *preservation of the natural character of ...wetlands, and lakes and river and their margins...* inclusive of natural elements, biophysical, and perceptual and experiential aspects that comprise the *natural character* of an area. Although *hydrology* is an implicit aspect of *natural character*, I would suggest that the retention of the word *hydrology* is an appropriate emphasis within the chapter. I consider that this would also address the ambiguity of policy 25.2.2.1a viii, which protects vegetation on the margins of natural watercourses and wetlands. This is distinct from *natural character*, which includes the terrestrial margin of influence of water bodies, such that the vegetation which contributes to the *natural character* forms the margin of the wetland, lake or river.



While I acknowledge the general protection of *Objective 25.2.2.2 -2*, from a landscape character and amenity perspective, I would support the addition of the following policy, or something similar, to policy 25.2.2.2a; *Earthworks shall occur in a way that preserves the natural character, including hydrology, of the Mangakotukutuku Gully and Waikato River margins.*

Submission Number 46

Ben and Rachel Inger

Subpoint 46.7 Appendix 1.2 Information Requirements

Subject; Appendix 1.2.2.24, Landscape Concept Plans Peacocke Structure Plan Area.

Submission Number 53

The Adare Company

Subpoint 53.86 Appendix 1.2 Information Requirements

Subject; Appendix 1.2.2.24, Landscape Concept Plans Peacocke Structure Plan Area.

The sub points for *Submission 46* and *53* are identical and request the same wording changes within the first two paragraphs of appendix 1.2.2.24. The proposed changes seek to remove the requirement of a *Landscape Concept Plan* for a subdivision *which is adjacent to or includes any open space zone or involves more than two hectares of land*. The changes reflect the need to identify and protect and or enhance opportunities created by open space within a subdivision. The sub points also remove the reference to adjacent open space zones.

Comment

From a *landscape character* and amenity perspective, I do not consider that the removal of the requirement for the preparation of a *Landscape Concept Plan* where a subdivision includes an open space zone is appropriate. Given that almost all the Peacocke growth cell is currently in private ownership, the landscape provision must be applicable to private land that is being subdivided.

I do however support the removal of the requirement to prepare a *Landscape Concept Plan* for an *adjacent open space zone*. I consider the deletion of that requirement is appropriate as that land is not included in the development and sufficient consideration of adjacent areas is captured in Section 1.2.2.2.1. *Additional Requirements for Concept Plans for the Peacocke Structure Plan*. This section requires a demonstration of the response to adjacent contexts with regard to i) *Transport Network*, iii) *Natural Environment*, iv) *Open Space Network*, v) *Land Use and* vi) *detailed Development Response*. In my opinion, although a *Landscape Concept Plan* is not required for adjacent open space, clear demonstration of the response to adjacent open space is still required to be addressed by this section.

Submission Number 55

Kainga Ora

Subpoint 55.3 Appendix 17-Planning Maps

Subject; New Layer Earthworks Overlay

Sub-point 55.3 considers that a new "Earthworks Overlay" should be included on the Structure Plan to indicate those areas of the Precinct where more sympathetic earthworks are required to respect the natural topography of the land. An overlay would enable developers and purchasers to understand the implications of potentially restricted earthworks, including costs to develop or limitations on development density

Comment



From a landscape character and amenity perspective, I do not support subpoint 55.3 as the *significant landscape features* within the PSP Precinct are identified and protected within the Structure Plan. There are no significant landscape features located within the *medium density residential zone* that would require the introduction of an earthworks overlay and consequently I do not consider it would provide any additional protection from earthworks.

Further I consider that, while it is recognised that *medium density residential development* will have an impact on the existing landscape, specifically that there will be a need for earthworks, this is an expected co-committant of urbanisation. The nature of the topography is such that from a landscape perspective, after the process of urbanisation, only the general natural landform will be discernible. Urbanisation is a continuation of land development that has already begun with the development of the rural context. I consider that from a landscape character and amenity perspective, for PSP Precinct earthworks guidance is sufficiently addressed within Chapter 25.

Subpoint 55.5 Proposed Chapter 3A Peacocke Structure Plan

Subject; Vision.

The sub-point 55.5 proposes amendments to the vision statement and supports the development of a list of specific matters that should be included as matters of discretion and assessment criteria on design outcomes. It recommends that any design guidelines are considered as non-statutory documents but referenced in an advice note against the relevant rules and effects standards. This allows them to be identified as best practice guidance while being able to be updated without going through a schedule 1 RMA process.

From a landscape character and amenity perspective, I am in general agreement with this suggestion (although it does vary from the approach previously undertaken).

Subpoint 55.400 Appendix 1.2 Information Requirements

Subject; Appendix 1.2.2.24, Landscape Concept Plans Peacocke Structure Plan Area.

The sub-point 55.400 for *Submission 55* addresses only the first paragraph of *Appendix 1.2.2.24*. and proposes that the phrase '*or land development*' is included in addition to subdivision application, as a trigger for the requirement of a *Landscape Concept Plan*. This change reflects a more comprehensive response to considering the effects of land development that may occur as a prelude to subdivision.

Comment

I agree with this suggested amendment as it increases broader consideration of developments that may impact opportunities and constraints for integration within the PSP Precinct. I would suggest *Appendix 1.2.2.24*. be amended to include the phrase '*or land development*' in addition to subdivision application.

Conclusions

From a landscape character and amenity perspective, the focus of the submission subpoints identified in this memorandum related to the following matters;

- *Natural character* issues with respect to *the Mangakotukutuku Gully and Waikato River margins*.
- *Natural character* issues with respect to *earthworks and vegetation removal* and the need for additional guidance by way of precinct wide earthworks plan.



- Clarification of when additional information requirements apply.
- Consideration of design guidelines as non-statutory documents.

I consider that the responses outlined in this memorandum relating to these matters assist in the clarification of the intent of the Plan Change 5. Please contact me should if you have any questions.

Your faithfully

Michael Graham

B Sc, BLA, NZILA Registered Landscape Architect
Director



Attachment 1

No.	Submitter	Accept/accept in part/ reject	issue	Relief sought
36.30	Waikato Regional Council	Accept	Addressing natural character of wetlands, lakes, rivers and their margins is an important part of achieving s6 RMA and in giving effect to WRPS Policy 12.2. Method 12.2.2 is particularly relevant for structure planning as it seeks restoration of natural character where it has been compromised. An additional policy providing direction around preservation of natural character of the Mangakotukutuku Gully and Waikato River margins and direction to restore natural character where compromised would provide improved consistency with these directions.	Add new policy as part of Natural Environment policies as follows: Preserve the natural character of the Mangakotukutuku Gully and Waikato River margins and protect it from inappropriate development. Where natural character has been compromised utilise opportunities to restore and enhance it
36.57	Waikato Regional Council	Accept	The intent of this policy is supported as it helps to address concerns around retaining a hydrological cycle that meets the predevelopment hydrological cycle. The policy should be extended (or new policy added) to cover the impacts from earthworks and vegetation clearance on natural character of gully and river/stream margins and riparian areas, wetland areas identified on the Peacocke plan maps, and aquatic biodiversity values.	Amend policy (or add new policy) to address impacts on: <ul style="list-style-type: none"> • Natural character of gully system and riparian margins • Identified wetland areas • Aquatic biodiversity values.
46.7	Ben and Rachel Inger	Accept in Part	The Landscape Concept Plan should relate to landscaping within public areas only rather than within private lots. The provisions should be clear that the content of the Landscape Concept Plan should relate to open space zones and the other public infrastructure described in (i), namely streets, footpaths, cycleways, stormwater swales, wetlands, detention basins, streams and riparian margins, as relevant to the subject site. A Landscape Concept Plan should not be required where public land is not existing, proposed or required for a particular site.	Amend Appendix 1.2.2.24 Landscape Concept Plans Peacocke Structure Plan Area as follows: "A Landscape Concept Plan shall be prepared for any subdivision application in the Peacocke Structure Plan area where the subdivision site involves more than 2 hectares of land and includes any open space zone or new public roads, footpaths, cycleways, stormwater swales, wetlands, detention basins and streams or riparian margins. The objectives of the Landscape Concept Plan are to identify opportunities for existing or proposed public land that is within the subdivision site to protect or enhance the natural character and cultural, heritage and amenity values, to recognise and provide for tangata whenua values and relationships with Peacocke, and their aspirations for the area, and to reflect the area's character and heritage. The Landscape Concept Plan shall include: . . ." [no suggested changes to (i) to (x)]
53.86	The Adare Company	Accept in Part	Amendments are required to ensure that the Landscape Concept Plans provide clear and helpful guidance to plan users: <ul style="list-style-type: none"> • The Landscape Concept Plan should relate to landscaping within public areas only rather than within private lots. •The provisions should be clear that the content of the Landscape Concept Plan should relate to open space zones and the other public infrastructure described in (i), namely streets, footpaths, cycleways, stormwater swales, wetlands, detention basins, streams and riparian margins, as relevant to the subject site. 	As per 46.7 above



			<p>•A Landscape Concept Plan should not be required where public land is not existing, proposed or required for a particular site.</p>	
55.03	<i>Kainga Ora</i>	Reject	<p>Kāinga Ora considers that a new “Earthworks Overlay” should be included on the Structure Plan to indicate those areas of the Precinct where more sympathetic earthworks are required to respect the natural topography of the land. An overlay would enable developers and purchasers to understand the implications of potentially restricted earthworks, including costs to develop or limitations on development density.</p>	<p>Amend and include a new “Earthworks Overlay” on the Structure Plan to indicate those areas of the Precinct where more sympathetic earthworks are required to respect the natural topography of the land.</p>
55.5	<i>Kainga Ora</i>	Accept	<p>Kāinga Ora considers that the vision needs to be clearer that the intent for the Peacocke Precinct is to achieve a medium to high density community and needs to set out the framework for achieving the vision (as it is very unclear at the moment how good design outcomes will be delivered). Kāinga Ora opposes and seeks the deletion of references to any design codes, guides or guidelines as de facto rules to be complied with in PC5, for example “is in accordance with any relevant design code”. The operative District Plan does not contain Design Guides suited to the medium to high density outcomes anticipated in the Peacocke Precinct. Kāinga Ora would support an alternative, whereby it works with the Council and its consultants to formulate a list of specific matters that should be included as matters of discretion and assessment criteria on design outcomes that are to be considered and could be incorporated into the District Plan. If there are any proposed design guides, design codes or guidelines to be developed, Kāinga Ora seeks that any such guides are treated as a non- statutory document that sits outside of the District Plan and referenced in an advice note against the relevant rules and effects standard to be considered when preparing an application. Urban Design guidelines are identified as providing best practice guidance and can be updated without going through a Schedule 1 of the RMA process.</p>	<p>Amend as follows: The vision for the Peacocke Precinct is that it will become a high-quality medium to high density urban environment that is based on urban design best practice, social well-being, and environmental responsibility.....The Peacocke Precinct is Hamilton’s southern growth cell and is ideally located to provide house approximately 20,000[TBC] people homes with easy access to destinations such as the Central City and the University of Waikato..... These features of the Peacocke Precinct means that it is important..... The Peacocke Precinct will be developed in line with Hamilton’s vision for a 20-minute city...This means establishing a local[TBC] centre, which will act as the central community hub, supported by a network of smaller neighbourhood centres, providing day to day convenience for residents..... The topography in Peacocke is typically undulating and earthworks will be required to achieve the densities envisaged in the area. It is important that these in identified locations of topographical / geological / cultural significance, earthworks are minimised and development responds to the natural landform. o guide development in the Peacocke Precinct, a Comprehensive Development Plan will need to be prepared with either a landuse or subdivision application to ensure that the vision for the Precinct is delivered. Information requirements will include concept plans for transport, infrastructure, the natural environment network, the open space network, landuse, landscape design, staging and integration, as well as a detailed development response (architecture and urban design) and an ecological rehabilitation and management plan. With respect to the [TBC] centre, a Master Plan is required and developers of the [TBC] Centre will take guidance from the non-statutory Peacocke Local Centre Design Guide.</p>
55.400	<i>Kainga Ora</i>	Accept	<p>Kāinga Ora supports the provision of a landscape concept plan and suggests only minor wording amendments. Importantly, the additional information requirements should also relate to land development because it may occur ahead of subdivision (which is encouraged to achieve higher density living outcomes).</p>	<p>Amend as follows: For any subdivision or land development application in the Peacocke Structure Plan Precinct adjoining or including any open space zone or involving more than two hectares of land, a Landscape Concept Plan shall be provided...</p>