

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT PORIRUA**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
KI PORIRUA**

**IN THE MATTER
AND
IN THE MATTER**

of the Resource Management Act 1991

**of the hearing of submissions on the Proposed
Porirua District Plan and Variation 1**

HEARING TOPIC:

**Hearing Stream 7 – Variation 1; Plan Change 19;
Residential; and Commercial Zones**

**STATEMENT OF PRIMARY EVIDENCE OF NICHOLAS JAMES RAE
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

(URBAN DESIGN)

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1. INTRODUCTION

- 1.1 My full name is Nicholas James Rae. I am an Urban Designer and Landscape Architect. I am the Director of Transurban Limited, consultants on urban development. I hold a Master of Urban Design from the University of Sydney and a Bachelor of Landscape Architecture (Honours) degree from Lincoln University. I have approximately 23 years experience in this field in New Zealand, the United Kingdom, France, Portugal, Saudi Arabia, and Australia.
- 1.2 I regularly provide advice on urban design and landscape matters, followed by urban design and visual assessments for development proposals including a range of residential, retirement villages, subdivisions for large greenfield sites, commercial office and retail spaces, and industrial developments. I have also provided advice on a number of plan changes relating to urban development. I have experience with the detailed design, consenting and implementation of development projects.
- 1.3 I have been involved in a number of plan review and plan change processes including assisting with drafting Plan Changes and assessing the merits of such. I provide a list of examples in Attachment A.
- 1.4 I am also involved with providing advice and design direction for three recent retirement villages, apartment building proposals, terrace housing proposals, affordable housing solutions, significant landscape solutions including significant lengths of coastal, wetland and stream rehabilitation as part of urban development integrating access and providing high amenity open space.
- 1.5 I am a member of the Urban Design Forum, Resource Management Law Association and the New Zealand Institute of Landscape Architects.

Involvement with Kāinga Ora Submission

- 1.6 I have visited the Wellington District over a two day period on 11 and 12 August 2022 where I visited locations on the public road network and reserves.
- 1.7 I have been retained by Kāinga Ora – Homes and Communities (“Kāinga Ora”) to provide urban design advice and supporting evidence relating to the plan changes notified by the five local authorities in Wellington dealing with the application of the Medium Density Residential Standards (“MDRS”) and the National Policy Statement on Urban Development (“NPSUD”). This is to ensure a consistent approach is applied where possible to the Wellington Region, understanding the relationships between the different districts.
- 1.8 I was instructed in July 2022 and undertook site investigations in August 2022 to assist with the preparation of the submissions, particularly on the matters of walkable catchments, role and scale of centres, and zone opportunities provision testing. I was assisted by Fabio Namiki of my office in our work. I had no involvement with the preparations of further submissions.
- 1.9 I also undertook a site visit with Mr Mike Cullen on 16 January 2023 where we focused on the centres in the Wellington region to assist with the consideration on their role and form.

Evidence of other experts

- 1.10 I rely on the evidence of Mr Liggett, who sets out why Kāinga Ora is involved in this Proposed District Plan (“PDP” or “Plan”) variation process, and importantly, from my perspective, that the focus is not only on individual land holdings owned by Kāinga Ora, but rather a focus on urban development outcomes more generally in Porirua City, as well as providing consistent planning policy across the Wellington Region and Aotearoa country that enables well-functioning urban environments and the opportunity for growth and intensification of our cities with ease and confidence.

- 1.11 Where appropriate and relevant, my evidence will reference and rely on the evidence of Ms Karen Williams and Mr Michael Cullen.
- 1.12 I have reviewed and reference the section 42A Report, and the statement of evidence of Mr McIndoe and the section 32 report and the McIndoe Memos 17, 18 and 20 relating to walkable catchments and sun access, building heights.

Code of Conduct

- 1.13 Although this is a Council hearing, I have read the Environment Court's Code of Conduct for Expert Witnesses within Practice Note 2023, and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

2. WALKABLE CATCHMENTS

- 2.1 I have reviewed the methodology for defining walkable catchments¹ in the PDP along with the work I have undertaken reviewing the methodology proposed by Wellington City Council.
- 2.2 I agree with Mr McIndoe and the Section 32 ("s32") analysis that walkable catchments around the MCZ and rail stations (which are stops on a Rapid Transit Service) should be defined using an 800m distance as the general principle, and reductions and expansions can be applied in terms of the application of zones in relation to this distance where there is either constraints or opportunities. I note that the NPSUD Policy 3(c) prefers expansion as it requires building heights of at least 6 storeys within at least a walkable catchment of RTS and Metropolitan centres.
- 2.3 I have highlighted "at least" as this provides direction that zones enabling 6 storey development can be applied outside a defined walkable catchment. I consider the other characteristics set out in the

¹ Section 32 report Part b Urban Intensification Appendix H, and Mr McIndoe Memo 20.

McIndoe memo (Primary Schools, Supermarket, and Local Park) are important aspects to support a well-functioning urban environment and support the catchment around centres and stations, but also potentially a wider higher density outcome.

- 2.4 The above-mentioned characteristics along with others in the McIndoe memo, such as gradients and quality of pedestrian accesses, are key aspects that contribute to a walkable environment, however I consider that if we were to zone areas based on the existing condition of the environment, the walkable catchments could be rather small. Another aspect for consideration is the proximity to employment and other facilities such as tertiary education institutions where higher densities could support people living and working / studying in an area. The relationship to employment areas in the Porirua Centre area outside of the Metropolitan Centre Zone (“MCZ”) are also in close proximity to residential areas and can also support walkability.
- 2.5 The NPSUD is seeking a significant change in the urban fabric and the increased density opportunity will enable the environment to be enhanced to support walkability. This includes the development within these areas, as they will play a very important role in achieving good walkability. It is why the design of the interface between private sites and the public realm is so important.
- 2.6 I consider that Jeff Speck explains this well in his book *“Walkable City”*² that *“to be favoured, a walk has to satisfy four main conditions: it must be useful, safe, comfortable and interesting”*. Mr McIndoe also refers to a similar statement within the publication *“Health and Wellbeing in Homes”* endorsing the same which specifically mentions the *“mix of uses it contains (especially the residential – retail mix)”*.³
- 2.7 The three criteria recommended by Mr McIndoe address some of the useful attributes, however, I consider that not all of these attributes need to exist, rather if they don’t, there should be the opportunity for these to exist. The quality of the environment is an outcome this is likely to

² J. Speck, *Walkable City*, New York, North Point Press, 2012, page 11.

³ McIndoeURBAN Report for Porirua City Council Health & Wellbeing Indicators in the Built Environment 20/08/2020, page 4.

develop over time through redevelopment along streets such that the catchment has a quality where people want to walk.

- 2.8 I agree with Mr McIndoe that new primary schools are difficult to establish in brownfield locations, but not impossible, and it depends on the typology that a primary school might occupy in the future. The traditional schools have occupied large areas of land, however, schools such as AEG in Auckland are within the urban fabric of Newmarket, a very urban context housed within multi-storey buildings. Their recreational opportunities are within the site and make use of open space such as the Auckland Domain. I note these are not public schools, and the Ministry of Education has not employed this typology for New Zealand primary schools yet to my knowledge. The provision of schools is also related to the residential catchment, so a small catchment with a small population will be unlikely to support another school if one exists nearby for example. I make this point as the application of the HRZ at Mana is within a smaller catchment as proposed by the PDP, and I understand this has been limited due to the lack of a school. The centre could provide a new school if desired. I discuss Mana further below, however, I consider that the other attributes support a higher density opportunity at Mana.
- 2.9 I consider a more enabling approach to walkable catchments should be used based on time, resulting in a distance, and whether the environment has, or could have the attributes to support walkability, as I consider the NPSUD is seeking to enable greater opportunities for higher density outcomes rather than to not enable development based on current attributes.
- 2.10 I consider that the urban area of the Porirua and Wellington City corridor is heavily constrained by landform, which suggests that density needs to be enabled where possible to support an “up” not “out” intensification strategy.
- 2.11 The main areas where I support a different application of the HRZ to the PDP are:

- (a) Around the MCZ due to my recommendation to increase the spatial extent of the MCZ to the north of the MCZ as provided in the PDP;
- (b) East of Mana and Paremata; and
- (c) Around the station at Pukerua Bay.

RESIDENTIAL ZONES

3. RESIDENTIAL OBJECTIVES AND POLICIES

- 3.1 Kainga Ora seeks to strengthen the design outcomes sought by ensuring that they are clearly stated in the Plan. The matters of discretion simply defer to the relevant policy and there are no assessment criteria, consistent with the rest of the Plan. The changes are in response to the submission seeking to remove design guides from the Plan.
- 3.2 The Section 42A (“s42A”) report confirms that the objectives of each zone set out the planned urban built environment⁴ and the policies and standards give effect to these urban forms.
- 3.3 The PDP Policy RESZ-P10 requires development not meeting permitted activity standards for number of residential units on a site to be assessed to determine whether the development is consistent with the Residential Design Guide.⁵ This is how the design guide is embedded in the Plan.
- 3.4 Moving then to the HRZ for example (and the same applies for the MRZ), HRZ-R1 enables buildings as a permitted activity where a proposal complies with the listed standards including HRZ-S1 (no more than 3 residential units per site). The achieves the MDRS requirement and no scope for change is enabled.
- 3.5 For more than three residential units on a site, HRZ-R1(2). provides for this outcome as a restricted discretionary activity, with matters limited

⁴ Section 42A report – Residential zones and General Topics - Section 3.10.1 para 383

⁵ APP3 – Residential Design Guide

to those in RESZ-P10, (which requires consistency with the design guide).

- 3.6 I assume that the intention is that for a proposal that is consistent with the design guide, it will achieve the objective of the zone which is:⁶

HRZ-O1	Planned urban built environment of the High Density Residential Zone
<p>The planned urban built environment in the High Density Residential Zone is characterised by:</p> <ol style="list-style-type: none"> 1. A planned built form of terraced housing and apartments buildings, predominantly six storeys in height; 2. A greater intensity of buildings than anticipated in the Medium Density Residential Zone and the MRZ - Residential Intensification Precinct; 3. A quality-built environment that provides for the health and well-being of people and communities residing in the Zone; and 4. An urban environment that is visually attractive, safe, easy to navigate and convenient to access. 	

- 3.7 The design guide is not explicit in this regard, and regardless of whether the design guide is part of the Plan or not, I recommend that the matters in HRZ-S1 link to the requirement to achieve the planned urban built environment, as this is ultimately what the Plan is seeking. This can be achieved either by amendment to HRZ-S1, or clear articulation within RESZ-P10.

- 3.8 I support the concept of requiring proposed buildings to undergo assessment to ensure quality-built environments can be achieved in support of achieving walkability and general benefit to people.

- 3.9 In regard to RESZ-P10, I generally support the wording as included in the Kainga Ora submission as this would provide a clear policy requiring outcomes, rather than it acting as a link to the design guide. I have suggested some improvements to these where I consider necessary, and these have been developed with Ms Williams resulting in a recommended version in Attachment A of her evidence:

- 3.10 The suggested adjustments seek to:
- (a) simplify the policy;
 - (b) clarify that building and landscape solutions need to be designed together with reference to the planned built character;

⁶ Porirua City Council draft district plan Variation1 High Density Residential zone.

- (c) clarify that the interface with the street is designed for people with appropriate interaction, and contribute to the streetscape in an interesting way which will support walkability;
- (d) clarify that the impact of service elements (air conditioner etc) and vehicle access should be minimised to ensure high amenity spaces for people;
- (e) ensure the design of individual units is robust in terms of privacy, sun access, and outlook
- (f) require consideration of existing outcomes on neighbouring sites.

4. ENABLING SMALL SCALE COMMERCIAL ACTIVITIES IN HRZ

4.1 Kainga Ora sought to change the activity status for HRZ-R20 from Discretionary to Restricted Discretionary, where the activity is at the ground floor of apartment buildings and not more than 200m² GFA with operational time restrictions. Assessment is required against the matters in RESZ-P11.⁷

4.2 I support this change as:

- (a) The design and use of the ground floor of apartment buildings is the most important aspect of such a development where they interact with the street or open space. Commercial activity at the ground floor is a good way to avoid potential privacy and amenity issues associated with residential at ground floor. These activities can provide meeting locations for residents and others in the neighbourhood, and can assist with live-work opportunities and the supply of daily needs.
- (b) The commercial activity can add to the activity at the street level, provide interest along the street which supports walkability.

⁷ Submission document 63 page 37

- 4.3 Commercial activity should be enabled and encouraged, and the proposed changes specifically provide for this at ground level of an apartment building with a maximum permitted gross floor area. The proposed wording acknowledges that any commercial activity will be ancillary to residential activity and at a location where it is best suited to avoid effects on the residential environment and has the potential to provide positive effects on the street amenity and for residential users of the site.

5. APPLICATION OF HRZ AND HEIGHTS AT PORIRUA METROPOLITAN CENTRE AND RTS

- 5.1 The PDP applies the HRZ to land around the Metropolitan centre at a distance of approximately 800m or a ten-minute walk. I agree that this distance is a good starting principle. This includes a strip of land opposite the LFRZ to the northwest along Titahi Bay Road and the land on either side of Awarua Street which includes the Mana College and Mahinawa Specialist School. These areas provide limited opportunities to increase the residential population near the centre.
- 5.2 The Section 42A report states that *“the extension of the HRZ into Takapūwāhia and Elsdon [to the west of Titahi Bay Road] seems to rely on the Metropolitan Centre Zone being extended northwards”*.⁸
- 5.3 I confirm that expanding the MCZ over the LFRZ to the north results in a much greater opportunity to expand the HRZ over the residential land to the west of the MCZ. This area is mostly within 800m of the MCZ and is also in proximity to schools and open space reserves within the urban area, and the Porirua Scenic Reserve to the west as backdrop to the area. The centre includes supermarkets and various other retail and services, however, the Pak n Save and Countdown are at a greater distance than the standard 1,200m criteria used in the Council methodology (at around 1,700m to 1,800m) at the western extremities. I note that Mr McIndoe states that residents may be willing to walk further to a local supermarket than to local convenience stores, given the greater utility a supermarket offers.⁹ I agree, and in my own

⁸ Section 42A paragraph 129

⁹ McIndoe Memo 20 page 2 bullet 1

experience, I walk over 2km to a supermarket, however those trips do not include purchasing many or bulky items, and usually combined with exercise. I also ride a bike to this supermarket with paniers to transport a large number of goods.

- 5.4 When considering the small area of land beyond the 800m catchment, I concluded that while it does not meet all the criteria, there are pockets of land contiguous with this residential area that could provide the opportunity for increased density in relatively close proximity to amenities, and support the centre, but also the other employment opportunities to the south also within a walking distance. There is good redevelopment potential in the area also due to the older housing stock on relatively flat topography. There would also be opportunities to add local parks in the area to further support an increased population.
- 5.5 I recommend that the HRZ applies to the area as illustrated on Map 3 in Attachment F, consistent with enabling a greater opportunity as signalled in the NPSUD of providing for at least 6 storeys within at least a walkable catchment.
- 5.6 The HRZ to the south of the MCZ applies to a reasonably large area of land currently being developed, however the closest area is occupied by the Bishop Viard College and a church, which I speculate will not provide much in the way of residential, however the opportunity is provided.
- 5.7 The land on the corner of Raiha Street and Kenepuru Drive is currently occupied by education facilities, and the PDP applies MRZ to this land. The Kainga Ora submission requests this be zoned HRZ. It is within 800m of the Kenepuru Station opposite employment opportunities in the Mixed Use zone, industrial to the west and very near the Hospital.
- 5.8 There are recreational opportunities on reserves between 350m and 700m to the south within the Wellington City Council area, which is not included in the image at paragraph 130 of the s42A report stating it is outside a 400m catchment of a local park. I think it is reasonable to expect that the Council territory boundary would not prevent people from using the facilities at Linden Park. There is no supermarket or

school in close proximity so this is another area which does not meet all the criteria. It is in two titles, it provides good opportunity, but due to the current land use it may not be developed for some time. I note this situation is not dissimilar to the land the PDP zones HRZ further along Raiha Street to the west (which is being developed), however in my opinion a better candidate due to the proximity to the station and good employment opportunities.

- 5.9 The area to the east of the motorway responds to the 800m catchment approximately from the RTS. This provides some intensification opportunity, augmented with the RIP over the MRZ further to the east. I support the Kainga Ora submission seeking to replace the Mixed Use zone with HRZ for the few lots fronting Mungavin Ave as it enhances the residential opportunity in close proximity to the centre with a greater height limit.
- 5.10 Kainga Ora sought addition to HRZ-S2 to enable 36m or 10 Storeys where located within 400m of the MCZ as depicted with a red hatch overlay on the submission maps 3 and 5. These areas are located to the west and south of the MCZ, and an area to the east of the motorway, north and south of Mungavin Ave.
- 5.11 Given the proximity of the HRZ to the MCZ particularly to the west and south, there is an opportunity to provide a transition in height from 22m to the 53m and provide even greater opportunity for intensive residential development in the locations closest to the centre.
- 5.12 The difference in the application of zones between the PDP and the Kainga Ora submission is illustrated in Attachment C, where the darkest orange represents the 36m height overlay, noting this is a high-level block model and not all of this land would be developed such as playing fields within schools for example, or within each site and HIRB to each site has not been applied.
- 5.13 For the height overlay areas to 36m, Attachment E, SK13 illustrates the outcome of using the 19m+60° and 50% building coverage. This requires a site to be 16.2m wide to achieve 10 Storeys (figure 4), and a 20m wide site when the floor-to-floor distances increase (figure 5) which

is more realistic. The 50% coverage standard is important for the same reasons as discussed in the section below addressing the alternative HIRB standard.

- 5.14 I support this opportunity particularly as it responds well to the wide Titahi Bay Road, and sits well in proximity with the MCZ.

6. APPLICATION OF HRZ AT MANA CENTRE AND RTS

- 6.1 I support the HDZ at Mana as proposed in the PDP, however I consider that this should be expanded to the east to better achieve the NPSUD Policy 3(c) in line with my discussion above on walkable catchments. I support the Kainga Ora submission, which seeks to apply an expanded HDZ to the east of Mana Esplanade.¹⁰
- 6.2 I consider that a starting point should be an 800m catchment around RTS, and Mana provides good opportunities in this regard particularly due to its location in a large natural environment, and the opportunity for Mana Esplanade to improve due to reduced pressure from vehicles passing through and the existing amenities provided.
- 6.3 While parts of the street network to the east of Mana are steeper than ideal from a walkability perspective, there are good footpaths on both sides of the streets and the environment provides reasonable connections.
- 6.4 Steep sites are not necessarily a constraint for high-density development, they require different design considerations which affect cost and feasibility as compared to a flat site. Landform and landscape are other considerations where the built form can enhance the landscape, responding to it rather than extending to a distance that is deemed walkable.
- 6.5 Apartment developments are usually successful on sites where there is a high amenity, including proximity to services, the quality of the environment around them, including open space provisions and views and access to services and community facilities.

¹⁰ Refer Map 11 of 13 in Attachment F

- 6.6 I acknowledge that there is no primary school at Mana, which is one of the criteria Council has used when assessing suitability for walkable catchments. In this case, the train station is the main driver as per the NPSUD, and whether or not a school exists is not required as a consideration for 6 storeys around a train station in my opinion, supported by the application of some HRZ along the Mana Esplanade. There is a primary school a short distance away at Plimmerton and one at Paremata however, which I agree, are less walkable.
- 6.7 The PDP zone form relationships are illustrated with a high-level block model in Attachment D SK01.
- 6.8 The Section 42A is concerned that not all of the expanded HRZ zone sought is within 400m of a local park as illustrated in Figure 16¹¹, which might be so, however, this map does not include linkages to the Cambourne walkway at the south eastern end of Mana View Road and enables access to the waterfront also providing recreational opportunities.
- 6.9 The PDP applies the MRZ to this area east of Mana with further restrictions on height to 9m applying to some sites due to shading considerations¹².
- 6.10 The intensification precinct does not apply to this area, as there is no school, however, there are other important attributes that support a higher density.
- 6.11 I note that the criteria for the application of the MRZ-RIP include being within 1000m of a school, 1,200m of a supermarket, and 400m of a local park with active play and playground, and within 800m of a rail station.¹³
- 6.12 From the analysis I have undertaken and reviewing Figure 19 in the Section 42A report¹⁴, it would appear that the areas included in the PDP zoned MRZ-RIP do not meet all of these criteria. Figure 19 shows a walking catchment of local parks, however, it does not extend to the

¹¹ Section 42A residential zones and general topics, page 33

¹² MRZ-S2(1)(d).

¹³ McIndoe memo 20, page 1& 2

¹⁴ Section 42A residential zones and general topics, page 35

northern area of Kiriwai Road where the MRZ-RIP is applied. If it is appropriate to zone an area such as this MRZ-RIP without meeting all criteria, then I consider other areas with good attributes that also may not meet all criteria should also have higher density opportunities such as Mana.

- 6.13 The difference between how the zones have been proposed is illustrated at Mana and Paremata for example, where in Paremata the intensification is provided through MRZ-RIP in response to an RTS, a small local centre with no supermarket, and where some recreation reserves exist, along with a primary school. The MRZ-RIP applies to the hilly land to the east and south of Paremata centre and I assume HRZ is not proposed here as not all the criteria exist (a supermarket in this case, or a park for some areas as above). The gradients of streets such as Kiriwai Road (1:8.2) and Paremata Drive (1:7) are steeper than Acheron Road (1:7.9) and Mana View Road (1:7.8) in Mana.
- 6.14 I would have expected that due to the lack of a school at Mana, the MRZ-RIP would apply at least in a similar way. While a school may be more important than a supermarket, I consider there is no hierarchy.
- 6.15 I acknowledge that the Height Control – Shading C (9m or 2 to 3 storeys) is proposed to apply to sites in Mana, and Height Control – Shading B (14m or 4 storeys) applies to Paremata, which may suggest that an overall height standard in Mana of 11m is more appropriate. I consider that the planned urban built form should also be in response to landform / landscape.
- 6.16 Figures 1 and 2 below illustrate the PDP zones and height standards at Mana and Paremata. The green highlighted sites in Mana (Figure 1) are within an 300m walk of the RTS on sites with good views to east and west parts of the harbour and easy access to the centre and other open space provisions, however, the MRZ on these sites provide no additional intensification opportunity and have a height limit of 11m which will sit lower than the 22m in the HRZ to the east even though they are on elevated land.



Figure 1 – Screen shot of PDP zoning at Mana where a mix of HRZ(22m) and MRZ (11m) apply along with a height reduction to 9m where height control C applies (hatched) – RTS is identified by the red asterix.

6.17 In comparison, Figure 2 illustrates that the residential intensification precinct (18m) applies to the dark green highlighted areas in Paremata, which is within an 800m walking distance of the RTS, but this walk is via a significant elevation change via a series of steps at the location marked with a purple dashed line. Sites in the Council’s proposed MRZ-RIP in Paremata have a 14m height restriction applied as illustrated with the hatch where they are subject to the proposed shading control.

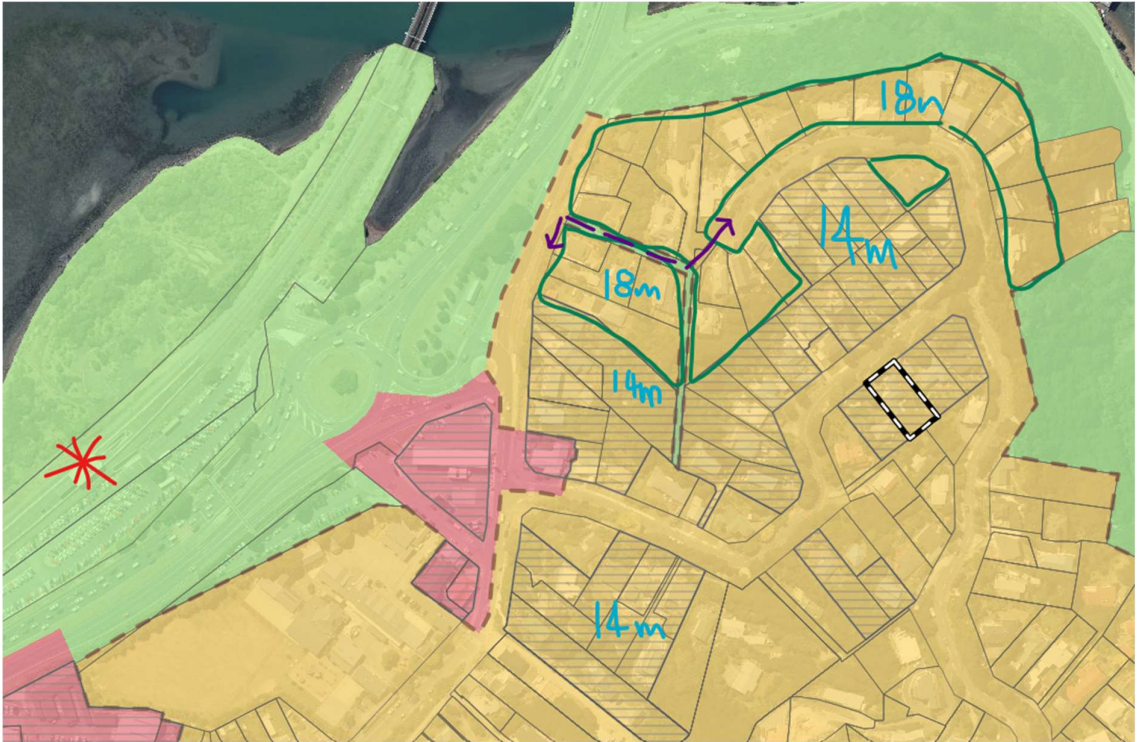


Figure 2 – example in Paremata where the MRZ applies along with the RIP enabling 18m on the headland, and 14m where height control B applies (hatched) – RTS is identified by the red asterix.

6.18 I consider that the green highlighted areas in Mana (Figure 1) are at least as good, if not more suitable for higher density than the dark green areas in Paremata, particularly as there is a direct street network linking directly to the RTS / centre with the furthest area being 300m from the RTS along the street. From a built form perspective, if it is desirable and appropriate to enable 5 storey buildings on the head land at Paremata, I consider it also appropriate at Mana. The following 3D view of Google Earth (Figure 3) illustrates the landform in question.

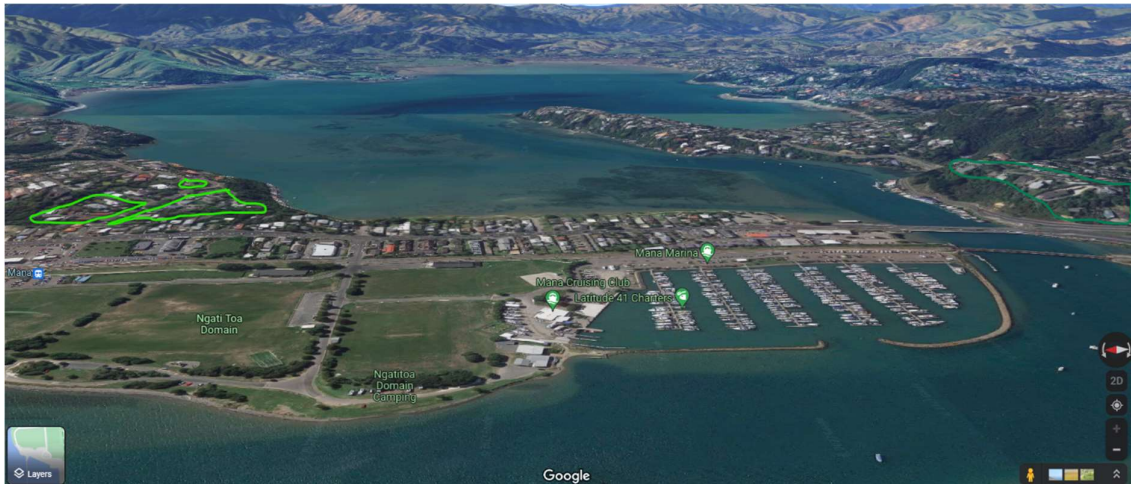


Figure 3 Screen capture of Google earth at Mana looking east with Paremata to the right, the light and dark green areas discussed above are roughly indicated as per the Figures 1 and 2 above.

- 6.19 These areas are challenging and are not typical environments where all criteria can be met, however taking a more liberal approach at these locations provides some enhanced opportunities.
- 6.20 Having considered the principles of applying the HRZ, I support the expanded HRZ to the east at Mana as per the Kainga Ora submission for the following reasons:
- (a) The area is accessible within 800m of the Mana train station, consistent with the walkable catchment for RTS as required by the NPSUD;
 - (b) The area is supported by a good size centre and recreational opportunities;
 - (c) The location has high amenity attributes, meaning it is a desirable location to live;
 - (d) It continues the application of the zone along the side of the hill to the north of Acheron Street as the PDP applies to the sites at the western end of this landform;

- (e) It continues the response to landform that the PDP proposes where the HRZ extend up the side of hills;
- (f) There are parts of the street network where gradients are steeper than ideal, however not excessive in the Wellington context and footpaths exist both sides of the streets. The streets can provide a walkable network and this does not require a reduction in area.

- 6.21 The PDP proposed height restriction to some sites in this area would suggest that 6 storey buildings are not appropriate. I consider the HRZ is appropriate, regardless of whether this overlay applies or not. The ability to build taller with a smaller footprint as detailed in the alternative HIRB section in the HRZ provides other opportunities for ensuring sunlight access for example.
- 6.22 The resulting building form opportunity for Mana is illustrated in Attachment D, SK02.
- 6.23 I agree with the Section 42A that the land at Gray Street, Plimmerton (Figure 20)¹⁵ has little to no opportunity and should be zoned MRZ.

7. APPLICATION OF HRZ AT PAREMATA CENTRE AND RTS

- 7.1 Recognising that the submission by Kāinga Ora to extend the spatial extent of the LCZ at Paremata is not being pursued, I consider this land should instead be zoned HRZ, in accordance with the NPSUD given its proximity to Paremata train station.
- 7.2 The Local Centre zone in this location as notified applies a height increase “A” to 22m. The land in question proposed MRZ with a precinct overlay increasing height to 18m. I consider a height of 22m within the block would be appropriate, consistent with the Local Centre zone. I have found no reason to have a lower height for the residential zone through the middle of this block and the small area would enable more residential opportunity.

¹⁵ Section 42A Residential page 35

- 7.3 I recommend that the red hatched area in Figure 4 is zoned HDZ. Revised plan maps are included in Attachment F.

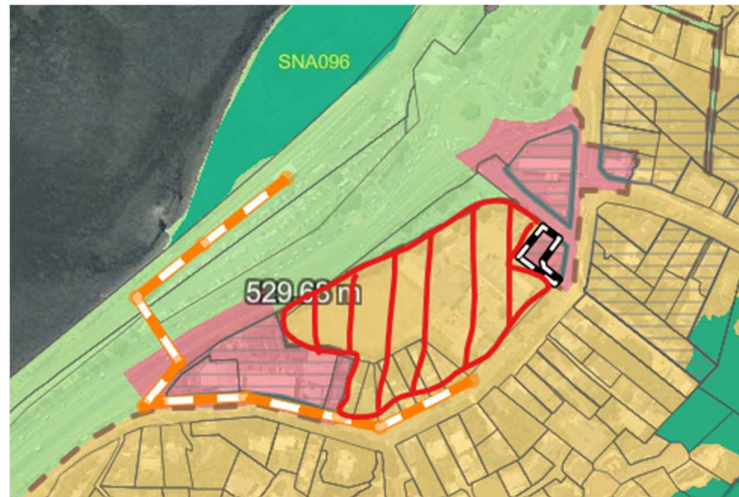


Figure 4 – recommended HRZ hatched red, being different to submission.

- 7.4 The proposed zone for land around the Paremata Local Centre is notified is MRZ. No HDZ is applied despite its proximity to a RTS, seemingly due to its walking distance from a supermarket – noting this is one of the indicators required within the Council's methodology.
- 7.5 In recognition of this however, the Council proposes MRZ-RIP providing for an increased height standard to 18m (five storeys) as illustrated in dark blue in Figure 5¹⁶. This is also consistent with the application of this precinct elsewhere in relation to a Local Centre.

¹⁶ Refer Porirua City Council proposed district plan on line

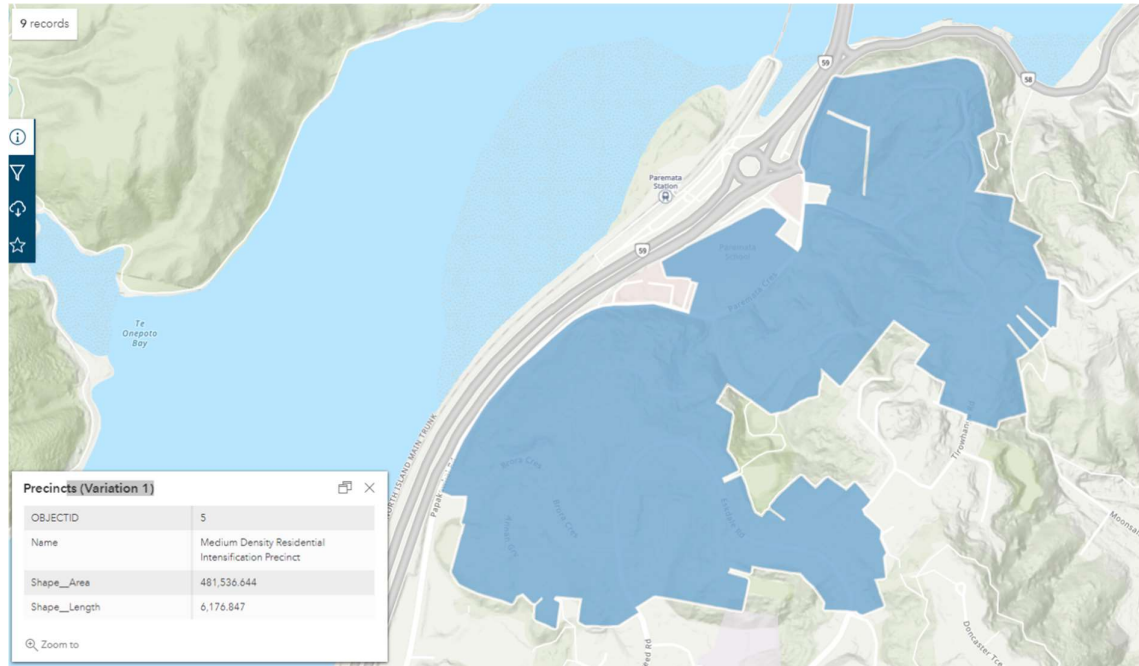


Figure 5 – illustrates the extent of the residential intensification precinct in Paremata.

- 7.6 The Kainga Ora submission sought the application of the HDZ to parts of the land within an 800m walk from the station. This fundamentally provides for 6 storey buildings as required by Policy 3(c)(i), but importantly provides the use of the more enabling HIRB control that provides greater ability to achieve taller buildings than the MRZ and MRZ-RIP which uses 6m+60° for the first 20m and 4m+60° beyond¹⁷. If the alternative HIRB as submitted by Kainga Ora is accepted, further opportunity could be provided through the use of 19m+60° for the first 20m.
- 7.7 Those lots fronting Paremata Crescent have good accessibility from the station and even though the lots are steep, they provide an opportunity for buildings to front the street and retain the slope. These also have good views to the harbour providing reasonable amenity. I recommend these are zoned HRZ to provide the opportunity.
- 7.8 The access up the hills from Paremata Crescent is via relatively steep streets and with a footpath on one site. In many parts the existing

¹⁷ Refer MRZ-S3 1.b. for full provisions

topography limits the ability to add a footpath on the opposite side. The gradients are 1:8.2 (Kiriwai Road) and 1:7 (Paremata Drive). These parameters would normally suggest the streets are not suitable for higher density outcomes, however they are existing streets and the PDP seeks to enable 4 - 5 storeys in this area, which extends at a significant distance from the station.

- 7.9 The widths of lots fronting Kiriwai Drive are in the order of 19m which enable 6 storey development. I consider some opportunity exists along Kiriwai Road and Paremata Drive, and I recommend some of this area is zoned HRZ. This is a reduction from the Kainga Ora submission responding to distance and land form, but maximises the opportunity over the option of 5 storeys or 4 storeys in parts. Nonetheless, it is marginal in terms of good walkability.
- 7.10 Refer to Attachment F for my recommended adjusted HRZ application at Paremata.

8. APPLICATION OF HRZ AT PUKERUA BAY CENTRE AND RTS

- 8.1 The RTS is driving the application of HRZ at Pukerua Bay where an 800m catchment has been applied in the Kainga Ora submission maps. I support this outcome, however, I have made some recommendations to reduce this area slightly and increase it at the eastern side consistent with an 800m distance from the RTS. The recommended maps are included in Attachment F. There is a primary school, open spaces and a dairy (plus other retail) within the catchment, however, no supermarket as per Council's criteria. I consider greater retail could establish if there is the population to support it and providing a higher density opportunity in a location that meets the intent of NPSUD could enable this. The location of the expanded centre links the station to the existing centre where the intention would be to enhance the quality of this immediate environment.
- 8.2 It might appear strange to enable 6 storey buildings in this environment, however, the wider area is planned to grow to the south significantly, and this will likely be lower density outcomes with no access to any new

stations. This is the right location for density in this growth area because of the opportunities provided for by the RTS. The landform and landscape also can support this type of development.

9. APPLICATION OF RESIDENTIAL INTENSIFICATION PRECINCT SPATIALLY

- 9.1 Kainga Ora sought to expand the application of the Residential Intensification Precinct (“RIP”) to a few small areas at Cannons Creek, Papakowhai and Whitby as illustrated in the Section 42A at pages 38 and 39.
- 9.2 At Gloucester Street, Cannons Creek, the area requested to apply the RIP maybe outside the 400m catchment of a park, however, it is within 430m of two schools and 600m from the Local centre at Warspire Ave, where there is another school. I consider a more liberal approach here for a relatively small opportunity is generally consistent with the criteria.
- 9.3 While the areas in question are outside of a 400m catchment to a park the boundary does not relate well to a landscape element such as at Aspiring Tce (Figure 6 below), where the PDP proposes to end the RIP part way along this street, rather than extending it along the full length of the small ridgeline upon which the street exists. The openness of the surrounding environment supports a taller built form on this ridge.
- 9.4 The areas to the right of Figure 6 is a retirement village, which generally provide their own onsite recreation spaces. The RIP would enable redevelopment of this site in a way that is consistent with the land to the north west, while retaining the lower intensity opportunity along Te Puia Drive.



Figure 6 – Screen shot from Figure 27 in the Section 42A report (showing the 400m catchment to a park and the two areas in yellow as exclude from RIP).

9.5 The two areas at Whitby might be slightly outside the catchment, or rear lots, however a neighbouring lot with the RIP applying is also a rear lot. The northern end of Furneaux Grove is falling away from the road, and those opposite are on significantly elevated land and less related to the street. A similar opportunity along the northern side of the street would respond to the context in a suitable way, rather than a change part way along.

10. ALTERNATIVE HIRB IN HRZ

10.1 Kainga Ora sought a change to the HRZ-S3 standard by enabling HIRB of 19m+60° applying to the side boundaries for the first 20m of a site from the front boundary, and retaining the 8m+60° for all other boundaries and other lower HIRB controls when a site is adjacent to the MRZ, heritage site, or site identified of significance to Māori.¹⁸

¹⁸ KO Submission ID71 page 42

- 10.2 Modelling my team has undertaken has demonstrated that the height in relation to boundary standard, as proposed by Council in the HRZ, is the main height controlling provision to achieve a 6 storey building for existing sites, rather than the height standard.
- 10.3 The modelling shows that to achieve 6 storey buildings using the proposed standards, the site width needs to be a minimum of 15.1m (rounded up), however, this assumes only a 3.5m minimum wide top floor, or the width of one bedroom. This is illustrated in Attachment E, SK11, Example 3. The pink planes in the image are the 8m+60° HIRB standard which apply to all boundaries except the front. This site width does not enable the HIRB to reach the maximum height of 22m.
- 10.4 Not all of this pink envelope can contain a building due to the required yard setbacks, and HRZ-S5 requires 20% of the site as Landscaped Area, consistent with the MDRS. However, in this case the site is 528.5m², and 20% of that is 105.7m². The yards total an area of 102.75m², which is just short of the requirement if all yards are landscaped. Regardless of the exact landscape area, the potential built form could occupy a large part of the site, but would be subject to outdoor space, outlook and other development standards. I note that this is a small site size to fit a 6 storey building and I expect the sites will generally be larger for this type of development.
- 10.5 No building coverage standard has been applied following advice from Mr McIndoe¹⁹ I understand, due to his recommendation of the 8m+60° HIRB restriction to enable increased density.
- 10.6 This example enables 6 storey buildings which is consistent with the NPSUD, however the floor-to-floor height used to test this is only 3m, which is the absolute minimum and is more likely to be greater than this, requiring a wider site. The height to the top of this 6th floor is 18m and a roof would be higher within the top triangle and assuming eaves and gutters can be included within the HIRB. Other considerations such as ground floor level relative to the street might raise the building and therefore, I consider a wider site will most likely be required. Mr McIndoe

¹⁹ Mr McIndoe Memo 18, Table 2.1

provides details and assumptions such as a 1.0m ground floor height above the site level and 3.15m floor-to-floor heights²⁰. I agree that these parameters are more likely to be used to ensure good spaces internally to apartments and enable flexibility on steeper slopes and support Mr McIndoe's view that 22m is appropriate for the HRZ.

- 10.7 The resultant apartment building form as illustrated is a stepped outcome and promotes a building that exists down the length of the site, potentially with balconies to the sides where they fit in the steps of the vertical walls and the HIRB envelope, or to the rear of the site. It provides sun to neighbouring sites to the extent the HIRB controls allow.
- 10.8 Whilst this example provides for a 6 storey building on a small site, it is anticipated that a number of sites would be amalgamated to enable a reasonably sized apartment building where the HIRB standards would not be so restricting, however, this will depend on the developers' ability and aspirations.
- 10.9 The wider a site needs to be to achieve 6 storeys, the fewer sites that could potentially enable this outcome to comply with permitted standards.
- 10.10 The alternative HIRB of 19m+60° applying to the first 20m and then the standard 8m+60° to the rear of the site as submitted by Kainga Ora enables greater height and number of storeys on narrower sites as illustrated in Attachment E Drawing SK12, where in this case it illustrates 7 storeys.
- 10.11 This outcome easily enables 6 storeys on the same width site as the example above and provides for greater floor-to-floor heights, an elevated ground floor above site level, and height for roof form within the 4m of height standard (22m) above 6 storeys.
- 10.12 If the entire envelope illustrated in pink on Attachment E SK12 is maximised with building due to no restriction on building coverage, a greater potential building form could result than the PDP example as one would expect (subject to other standards).

²⁰ Mr McIndoe Memo 18, Table 2.1

- 10.13 In this case as the site is small, the yards could provide most of the landscape requirement and do not provide many contributions to the amenity of the site, or neighbours' amenity.
- 10.14 The HRZ effectively provides an 80% building coverage opportunity, and I consider this to be too high resulting in significant bulk in either example. Mr McIndoe refers to the Daldy Street and Beaumont Street developments, and perimeter block examples in Barcelona where there are high site building coverages, however, the interesting point he makes, is that they have low-rise buildings in the central courtyard.²¹ This results in less overall bulk, or a good relationship between varied bulk.
- 10.15 Other Plans with similar zones include a 50% building coverage²² restriction to provide a balance of open space to building bulk.
- 10.16 Attachment E SK12 illustrates the same site as used in SK11 Example 3, but applying the 19m+60° and 8m+60°. This model does not show the total built form possible within this envelope if there is no building coverage restriction however in this case the rear could be occupied with built form.
- 10.17 Attachment E SK12 illustrates a building coverage of 43.2% building coverage. In my opinion, this is a good form for 6 storey buildings as the building can orientate to the street at all levels and to the rear yard, with no need for side windows. The outlook to the rear boundary in this example would be 14.5m, and if this was repeated as a flip to a site to the rear, there would be 29m between buildings. This provides excellent privacy separation, daylight and sunlight. However, this outcome would not be achieved or be as good if high buildings at the rear were also included.
- 10.18 I consider that the 19m+60° HIRB is a useful tool in achieving a good quality urban form (not suburban), however, I recommend such a standard needs to be linked with a building coverage standard of 50%.

²¹ Mr McIndoe Memo 18, Table 2.1, page 9.

²² Auckland Unitary Plan THAB zone, H6.6.11.

- 10.19 The building coverage recommendation was not explicitly included in the Kainga Ora submissions, however, my recommendation is as a result of testing this in detail.
- 10.20 I consider that outcomes such as those examples provided by Mr McIndoe with a lower built form to the rear could be achieved through a consent process (as required due to non-compliance with a building coverage standard of 50%) where the impact of additional bulk can be assessed. Specific guidance could be included in the guidelines relating to this.
- 10.21 When we consider these options in a street, the images in Attachment E, SK5 and SK6 illustrate the different outcomes between the PDP-HRZ and KO-HRZ (19m+60°) respectively, SK04 is included to illustrate the MRZ outcome on the same sites. These are modelled using 6 sites to the west of Porirua Centre as illustrated on SK01 without building coverage restriction.
- 10.22 In terms of the shading impact from these options, as an example we have selected the equinox (March) to provide shading diagrams at four times of the day in Attachment E using the same 6 sites as follows:
- (a) SK07 illustrates the outcome using the PDP model where no building coverage restriction applies, except yards;
 - (b) SK08 is the same as SK07, but with the Kainga Ora alternative HIRB addition (no building coverage restriction); and
 - (c) SK9 is the same as SK08, but with a 50% building coverage restriction applying to the front of the site to enable use of the available height.
- 10.23 This illustrates that by adding the 19m+60° HIRB (no building restriction), the possible shadow area increases in the street and neighbouring sites.
- 10.24 With 50% building coverage and using the alternative HIRB, compared with SK07, the shadow is reduced due to removing the bulk from the

rear of the sites, enabling more sun to the rear yards (and neighbouring yards) as illustrated in the 12pm example. Shadow is increased in areas due to the increased height at the front of the sites. It is a different outcome which is likely to result in sun access to more of the vertical sides of the building if no building in the rear yards exists.

10.25 This alternative HIRB standard and 50% building coverage will not prevent buildings occurring towards the rear of the site, however, the coverage standard would result in less building to the front of the site, or a perimeter form with no building in the middle or many such options. I consider these standards encourage a built form to the street which is a desirable outcome in the HRZ.

10.26 I consider that using the 19m+60°HIRB with a 50% results in a superior built form outcome as it:

- (a) enables 6 storeys better than the PDP standard;
- (b) assists in providing the opportunity for apartments to be designed so they can overlook the street or rear yard;
- (c) provide for inactive side relationships between buildings (but ideally could abut one another with common wall);
- (d) sun access is good; and
- (e) provides a balance of open space which can add to the amenity of the development including good outlook and privacy where trees could thrive.

11. FRONT YARD HRZ

11.1 Kainga Ora sought in submission (OS76.153) to remove the 1.5m (minimum) front yard standard in the HDZ. The basis for this as I understand was to enable buildings to abut the front boundary.

11.2 I agree with Mr McIndoe²³ that providing a transition from the street to residential activities at ground floor is desirable to assist with privacy

²³ EIC Mr McIndoe Paras 29

and that a vegetated interface can add to the quality of the environment, particularly the contribution to the streetscape character.

- 11.3 I assume the desired outcome is a softer planted interface between residential apartment buildings and the street in the HDZ with buildings set back at least 1.5m, however, I consider this should be made clear in RESZ-P10. The 20% landscape requirement (HRZ-S5) would enable the front yard to be planted, but there is no standard requiring it. The outcome would need to be assessed and options to achieve this included in the design guide, which is appropriate. The alternative is that a standard is introduced such as 50% of the front yard is planted (similar to Auckland THAB zone) to require this outcome, and then assessment is related to whether the outcome is achieved.

12. DESIGN GUIDES WITHIN THE DISTRICT PLAN

- 12.1 I have reviewed other District Plans and have found that Design Guidelines are both statutory and non-statutory throughout the Country.
- 12.2 One Plan that is similar to the PDP is the Proposed Queenstown Lakes District Plan (“QLDP”), where in the high density residential zone, Policy 9.2.2.4 *“Require consideration of the relevant design elements identified in the Residential Zone Design Guide 2021”*.²⁴ And it states that this guideline is incorporated (in the District Plan) by reference.²⁵ *And “the Council will use this guide under section 104(1)(c) of the Resource Management Act to help it assess and make decisions on resource consent applications.”*²⁶ The Residential guideline states that *“Development that is consistent with the intent of the design guide is likely to be consistent with the relevant District Plan Chapter objectives and policies”*.²⁷
- 12.3 The difference here is the wording of the QLDP policy which requires ‘consideration of’, rather than ‘consistency with’ as proposed in HRZ-

²⁴ <https://www.qldc.govt.nz/media/ntultxai/pdp-chapter-09-high-density-residential-apr-2022.pdf>

²⁵ <https://www.qldc.govt.nz/your-council/district-plan/proposed-district-plan/documents-incorporated-by-reference>

²⁶ https://www.qldc.govt.nz/media/nblldc0/2021-qldc_residential-design-guide.pdf

²⁷ <https://www.qldc.govt.nz/your-council/district-plan/proposed-district-plan/documents-incorporated-by-reference/residential-design-guide.pdf>, page 4

P7 for example. I am concerned with the lack of specific direction in the specific policies for the different zones in the PDP.

- 12.4 The Jacks Point Special zone²⁸ states that: *“The preparation of development controls and non-regulatory design guidelines, in conjunction with provisions of the District Plan and other methods, will ensure provision for the social, economic and cultural wellbeing of the wider community, while also assisting in ecological enhancement and the seamless integration of the built and natural environment.”*
- 12.5 I understand that The Jacks Point Residential Design Guidelines are referred to in Conditions of consent for a resource consent(s), and state that *“The following guidelines set out the objectives against which the development will be assessed, and preferred means of meeting each objective is also set out”*.²⁹
- 12.6 I agree that the guidelines can be statutory or not, and that they are useful when designing and assessing proposals, however the Queenstown Lakes example illustrates a policy framework that better provides clear direction as to outcomes, and then refers to the guidelines in addition, such as set out as an example below.³⁰

Policies

- 9.2.2.1 Require that development within the zone responds to its context, with a particular emphasis on the following essential built form outcomes:
- a. achieving high levels of visual interest and avoiding blank or unarticulated walls or facades;
 - b. achieving well-overlooked, activated streets and public open spaces, including by not visually or spatially dominating street edges with garaging, parking or access ways;
 - c. achieving a variation and modulation in building mass, including roof forms;
 - d. use landscaped areas to add to the visual amenity values of the development for on-site residents or visitors, neighbours, and the wider public.
- 9.2.2.2 Support greater building height where development is designed to achieve an exemplary standard of quality, including its environmental sustainability.
- 9.2.2.3 Promote a distinct streetscape for the Arthurs Point High Density Residential neighbourhood that is based upon a shared and integrated public realm.
- 9.2.2.4 Require consideration of the relevant design elements identified in the Residential Zone Design Guide 2021.

²⁸ <https://www.qldc.govt.nz/media/xpndne5l/pdp-chapter-41-jacks-point-dec-2022.pdf> Proposed District Plan under Appeal, 4.1.1 zone purpose.

²⁹ Jacks Point Residential Guidelines, Version 3 -September 2009, page 3

³⁰ <https://www.qldc.govt.nz/media/ntultxai/pdp-chapter-09-high-density-residential-apr-2022.pdf>

- 12.7 I understand that a Plan Change to the PDP would be required if alterations to a guideline were required, and by not including these in the Plan as Kainga Ora requested would enable adjustments such as I am recommending below to be undertaken without holding up the implementation of the PDP.
- 12.8 My point is that I consider that the policies should be clear as to the outcome required, the use of guidelines should provide guidance and examples of methods to achieve the policies. In my view, the guidelines as currently proposed are trying to convey the outcome desired, but they are only guidelines, and I do not consider they are specific enough for the different zones.
- 12.9 I consider that the PDP guidelines include some very good information and I support their use generally, however, I have provided some recommendations in Attachment B.
- 12.10 I suggest that rather than providing a tracked change version of the guideline, it would be useful to workshop these with other experts to achieve refined wording and images.
- 12.11 If the commissioners determine there is a benefit in revising these guidelines, then I would be willing to assist in this process. This is a difficult task to resolve through an evidence format without a collaborative approach.
- 12.12 The guidelines may also differ depending on how the land is zoned and these aspects and the key design outcomes for each zone need to be determined for which the guideline can then provide further detail and examples. For example, if the LRFZ is retained at the northern end of the MCZ next to the harbour, the guidelines should be significantly enhanced to ensure an appropriate outcome.

COMMERCIAL ZONES

13. ROLE OF CENTRES

- 13.1 In support of the strategic direction, residential activity within the centres should be enabled, encouraged and maximised. This is because the

residential areas around the Metropolitan Centre and Mana and Paremata are limited in extent mainly due to the physical environment limitations. Given these limitations, the density within the residential areas around the centres should also be maximised.

14. COMMERCIAL OBJECTIVES AND POLICIES

- 14.1 Changes proposed to MCZ-P7 by Kainga Ora are to ensure the policy framework provides clear outcomes for the zone, rather than providing a link to a design guide, and will work well as matters for assessment. This is consistent with the changes sought to the residential zones. I agree that the guides are a useful tool when assessing a proposal, however, the outcome should be described in the policy.
- 14.2 I have reviewed the proposed changes proposed in the relief sought by Kainga Ora, which were taken from the guidelines at the time, and I consider these could be significantly strengthened.
- 14.3 I have worked with Ms Williams on alternative wording for MCZ-P7 and the result is recommended within Attachment A of Ms Williams' statement.
- 14.4 In my opinion, the recommended wording better defines the desired outcome for the zone and enables assessment against these where a clear 'yes' or 'no' can be reached as to whether a proposal achieves the Policy.

15. HEIGHT OF METROPOLITAN CENTRE

- 15.1 The PDP proposes to zone Porirua Centre a Metropolitan Centre with a height standard of 50m. The Kainga Ora submission seeks to increase this to 53m to enable 15-16 storeys.
- 15.2 I consider that an additional 3m will have little to no perceived impact and I support greater residential or commercial opportunity within the centre enabled by this increase. I understand that this submission point has support within the s42A report and from Mr McIndoe.

16. EXPANSION OF METROPOLITAN CENTRE ZONE

- 16.1 The PDP includes a Large Format Retail Zone (LFRZ) to the north of the Metropolitan Centre which borders Te Awarua-o-Porirua Harbour and Porirua Stream , and Residential and Open Space zones to the west.
- 16.2 Many LFR buildings currently exist at this location and back on to this context.
- 16.3 The waterfront and stream are significant assets for Porirua in terms of providing recreational opportunities and amenity and the existing built form response is very poor. These environments provide excellent opportunities for the population of Porirua and development should respond in a positive way where the benefits of these attributes can be maximised. Figures 7 and 8 illustrate the existing poor building response (blank walls, service access and rubbish storage) and the existing quality of the water's edge.



Figure 7 – View along Wi Neera Drive to the north illustrating the rear of LFR activities to the left and the open space along the waterfront to the right (Google Street view image)



Figure 8 – view looking north further north along Wi Neera Drive with The Warehouse building backing onto the waterfront, (Google Street view image).

- 16.4 At the northern end of the LFRZ exists a large area of land housing the Whitireia campus which has many single level buildings set back large distances from the street, and in many cases beyond car parking. A relatively recent two level building exists near the northern end also set back a considerable distance from the street behind car parking. The existing development has a very poor relationship to the residential and open space areas to the west, not helped by the very wide road reserve of Titahi Bay Road. There is significant opportunity for development on either side of this road to enhance the relationships, provide for a walkable environment and enable density.



Figure 9 - view from Wi Neera Drive to the northern end of the Whitireia campus with the waterfront to the right, (Google Street view image).



Figure 10 – view from intersection of Titahi Bay Road with Te Hiko Street looking south illustrating the width of the road and residential opportunity to the right, (Google Street view image).



Figure 11 - View from Titahi Bay Road further south where buildings currently back on to Titahi Bay Road, and open space to the right, (Google Street view image).

- 16.5 Currently Porirua is a car-centric centre as the existing supporting residential population is removed or separated from the centre. In my opinion, the centre needs an injection of a residential population to assist with establishing a well-functioning urban environment. The MCZ is generally flat and, with the inclusion of the large format retail area in an expanded MCZ, would provide significant development opportunities over time. The land to the north west of the MCZ provides additional significant open space, primary and secondary schools and a residential catchment that has the best opportunity to access the centre.
- 16.6 Porirua East is separated from the centre by the Porirua Stream, the main trunk railway line, and the Johnsonville-Porirua motorway. Very few connections across this infrastructure are provided therefore limiting accessibility. The quality of these connections is poor and does not encourage pedestrian access to and from the centre, however ideally connections would be improved to further assist with linking the residential to the east.
- 16.7 I conclude that residential opportunity to the west of Porirua Stream should be maximised to take advantage of this environment providing opportunity for walkability. This is both in the centre and around it.

- 16.8 The Kainga Ora Submission seeks that the LFRZ land north of the MCZ is changed to MCZ. I support this from an urban design perspective as this area provides very good opportunities for redevelopment, particularly for residential that can address the street and benefit from the waterfront amenity creating a desirable interface with the estuary which is attractive. In addition, the southern area of the LFRZ is an easy walk to the RTS, and the northern extent is 1,920m to the RTS, a distance that some people might walk in this context.
- 16.9 However, being able to access the rail is desirable for those who wish to move out of Porirua, but is not important for those living and working in Porirua which should have priority. The Library and Art + Museum, aquatic centre and the associated park currently exist at the northern end of the MCZ, which would become central to the expanded MCZ providing a central community hub for a wider population.
- 16.10 I consider that the MCZ is a more effective zoning to the LFRZ in this location as:
- (a) It provides for a much greater opportunity for all activities, with 53m height provision rather than 6 storeys in the LFRZ.
 - (b) The MCZ objectives and policies has a focus on **creating a vibrant focal point** of the city with a wide range of commercial, community recreation and residential activities, housed in a compact, built form that is well designed, high quality and contributes to attractive and safe public spaces, which is attractive to live, work and visit. These outcomes are what should be achieved at the interface with the harbour and stream.
 - (c) The MCZ seeks a planned urban built environment that reflects a high density built form with high quality public spaces, rather than the converse of the LFRZ which seeks to **minimise adverse effects on amenity values** of adjacent sites in residential zone and open space and recreational zones.

- (d) The natural context is desirable for residential amenity, i.e. it is an attractive place.
 - (e) The description of the LFRZ states that “*The Large Format Retail Zone offers employment opportunities and serves Porirua City and the wider region and is not necessarily connected to a residential catchment. It is primarily accessed by car*”.³¹ This does not sit well with the main residential catchment directly to the west and north west of this area, and supports more car movements in the centre, rather than pedestrian outcomes which should have priority.
- 16.11 Residential activity is permitted in both zones, but is limited to three units in the LFRZ with restricted discretionary status for more than three with matters listed in LFRZ-P7. I consider it seeks to prioritise LFR over residential. The design is to be assessed against the LFR design guide which look to be a repeat of the residential guidelines, rather than guidance on how to achieve residential with LRF outcomes.
- 16.12 The MCZ does not restrict the number of residential units, and importantly, requires design to achieve the planned outcome for the MCZ. This is more consistent with NPSUD Policy 3(b) and (c) of providing for at least 6 storeys either within or around the MCZ.
- 16.13 I consider that the LFRZ does not take advantage of the significant opportunity the land provides to provide residential outcomes within walking distance of the main centre and assist with creating a well functioning urban environment and a more compact city. The MCZ requires a better physical outcome due to the strengthened urban design outcomes that are imbedded in the MCZ which I consider are desirable in this location.
- 16.14 From an urban design perspective, I recommend that the MCZ replaces the LFRZ to the north of the Porirua Metropolitan Centre as depicted in Map 3 in Attachment F as it would result in improved design outcomes for (re)development in this area.

³¹ PDP Large Format Retail zone introduction

16.15 A consequential change may require identification of primary streets that might need to apply.

16.16 To understand the resulting form, refer to Attachment C where I have included a high level model illustrating the different heights for the zones at a block grain. This illustrates that there is good opportunity to the north, and actually limited opportunity in the existing MCZ due to the significant areas of road reserve.

17. HEIGHT OF LOCAL CENTRES TO 22M

17.1 The PDP applies the MRZ-RIP around all Local Centres with a height standard of 18m, except at Ranui, Mana and Plimmerton where the HRZ is applied due to their overlap with train stations, and MCZ at Ranui. A 22m Height Control applies to these centres, consistent with the HRZ height.

17.2 Kainga Ora seeks a more consistent approach for a permitted height of 22m in all local centres.

17.3 The additional height of the buildings could enable better legibility of the centre in relation to their surroundings while providing a greater development opportunity at the centre which supports the compact objective. I consider that while the height of the centres would be consistent, the relationship to neighbouring zones around them at different locations will not be consistent (i.e. The centre could be higher than the surrounding MRZ-RIP, but the same height as HRZ). However, as I have outlined in Mana, I consider additional height could be appropriate at that centre and could therefore also achieve these built-form benefits.

17.4 The footprint of sites in some of these local centres are quite small with significant car parking around them in road reserve (refer to Figure 12 below). The height increase will support maximising the opportunities at these locations and relate to a wide road space.

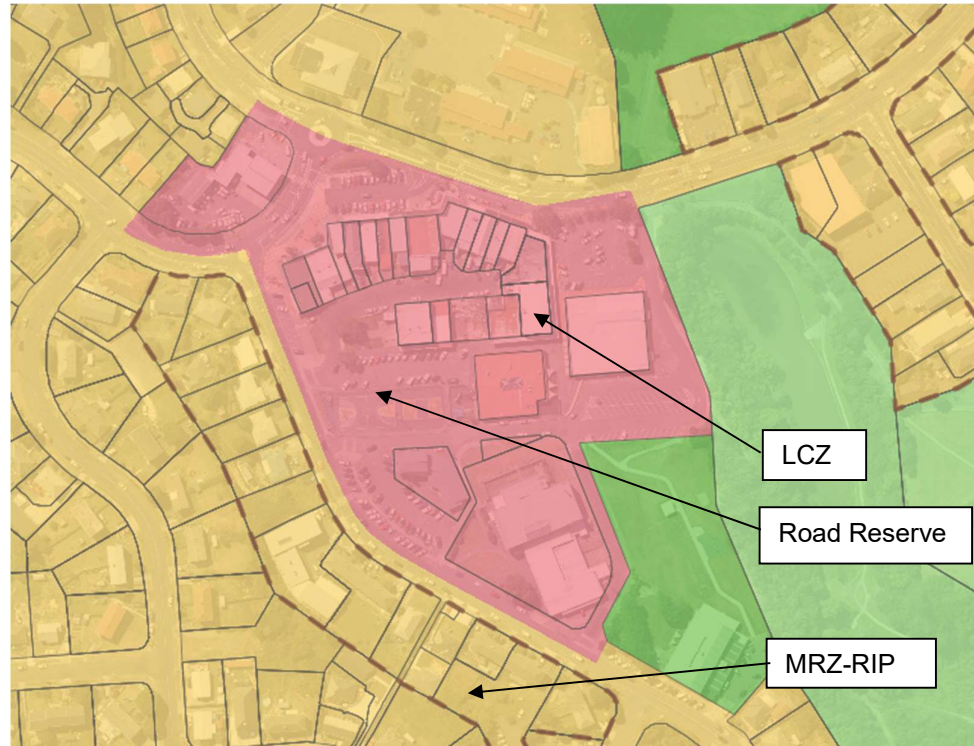


Figure 12 – PDP illustrating the small site sizes at Canons Creek, relative to car parking in the road reserve and the separation to the MRZ-RIP.

18. PUKERUA BAY HEIGHT AND SIZE

- 18.1 The Neighbourhood centre at Pukerua Bay is going to be driven by the residential catchment, and the potential for residential growth is provided for by the application of the HRZ in response to the RTS, and the opportunities provided by the MRZ. Please refer to the residential section on these zones.
- 18.2 I consider that while this area is currently dislocated from the existing urban fabric, the change to the state highway provides for an enhanced amenity opportunity for residential activities in a high amenity landscape.
- 18.3 Expanding the centre to the west to Rawhiti Road enables the centre to relate to local roads where the amenity can be enhanced. Expanding to the east enables activities to relate to the station and enables the enhancement of the pedestrian network around the station to assist with

safety and legibility. This is particularly important across the former State Highway 1.

- 18.4 As the HRZ is proposed around the station and this centre, a height standard of 22m is appropriate, consistent with the HRZ zone and aligns with the NPSUD of providing for 6 storeys within a walkable catchment of the station.

19. PROPOSED WORDING CHANGES SOUGHT

- 19.1 I rely on the evidence of Ms Williams for any recommended changes to the words used within the Plan as set out in her Appendix A.
- 19.2 I have reviewed these and to the extent they are urban design related, I support the changes as they reflect my findings and advice.

Nicholas J Rae

24 February 2023

ATTACHMENT A – LIST OF RELEVANT EXPERIENCE NJ RAE

- (a) Proposed New Plymouth District Plan – Assisted Kāinga Ora following submissions with analysis, and advice and provided evidence to the hearings panels on the topics of viewshafts, residential, commercial and mixed use zones and zone application.
- (b) Plan Changes 51 and 61 to the Auckland Unitary Plan (“AUP”) – reviewed the proposed private plan changes for Drury West and provided evidence to support submissions with regard to consideration of Town Centre, Local Centre, Terrace House and Apartment, and Mixed Housing Urban zones near a proposed new rail station in the Drury growth area.
- (c) Central Hawke’s Bay District Plan - I have provided evidence to the Proposed District Plan relating to intensification provisions.
- (d) Plan Change 26 in Tauranga City –assessment of the proposed intensification in the Te Papa peninsula in Tauranga city in regard to the existing viewshafts that seek to retain views to the Mauao (Mt Manganui).
- (e) Plan Change 67 to the AUP – assisted with drafting changes to an existing precinct applying to approximately 200ha of land in Hingaia Auckland, and providing evidence to an independent hearing.
- (f) My team and I currently provide a design review role for residential proposals in a new subdivision in Hingaia, Auckland against developer led design guidelines.
- (g) Proposed Queenstown Lakes District Plan Appeal for Jack’s Point, providing advice and draft evidence to the Jack’s Point Residents and Owners Association regarding landuse classification (effectively a precinct) in the Village which

included reviewing the Comprehensive development plan and design guidelines. Resolved prior to hearing.

- (h) Proposed Auckland Unitary Plan - I provided evidence to the Independent Hearings Panel hearings on the proposed AUP for private land holders.
- (i) America's Cup Resource consent – I provided advice and evidence on behalf of resident groups in the Viaduct Harbour in relation to the visual effects of the proposed America's Cup development proposed. This included consideration of the effect on lower order views along streets and within the Viaduct harbour.
- (j) Plan Change to rezone the western side of the airport at Frankton (Queenstown) – This involved providing advice and evidence on behalf of a submitter on the importance and management of views to the Remarkables mountain range.
- (k) Kingseat – Proposed concept plan to support submissions on the then Franklin District Plan Rural Plan Changes, which was followed closely being involved in the AUP processes. This considered a wider area of land than originally proposed at a scale that would better provide for and support the local community with retail and school provisions. It suggested different commercial centre locations and roading networks along with some light industrial and residential zones. The concept was not taken up at that time.
- (l) Clarks Beach – Proposed masterplan, Precinct plan and zone provisions and evidence to support a Special Housing area proposed for 50ha of land in the then Future Urban Zone to the eastern end of the existing development at Clarks Beach. This included proposed new road alignments, comprehensive open space networks also providing for a new 'stream' and coastal outfall and coastal rehabilitation, a neighbourhood centre and a mix of residential opportunities.

Approximately half of this is consented and of that 4/5ths of the subdivision has been constructed.

- (m) Silverdale South – Proposed an alternative development pattern and land use (a mixed use and residential outcome proposed) for the area known as PC123 to the Rodney District Plan which was approved, and then included into the AUP as a General Business zone and Mixed Housing Urban zone. This is land to the south and east of the Silverdale Busway station and park n ride facility. Significant development work is underway with many houses built along with commercial development constructed and consented. The Botanic Retirement village is now part of this development, providing for around 500 units south of the park n ride. I assisted with the design and consenting of that development.
- (n) Kumeu Town Centre – Masterplan, Precinct plan and provisions to support an application for a private plan change in Kumeu. This has resulted in a Town Centre zone and Mixed Housing Urban zone to the north east of the State Highway 16 and railway. Much of this is under construction, including buildings I have been involved with from a design perspective.
- (o) Takanini Town Centre (east) – Masterplan, Precinct provisions and evidence to support opposition to a Council Plan Change proposing the land at 30 Walters Road to be residential. This has resulted in a Town Centre zoning through both the original plan change and the AUP process consistent with the structure plan. The structure plan included a train station (new Takanini station) abutting the land, however no station has resulted even following the developer offering to build the platforms. The land has been developed and is largely retail with some medical, offices and real estate agents. The development won a Property Council award in 2015.

- (p) Rototuna North Centre – I was involved with the design of this centre for the landowner along with provision for residential and interfaces with the proposed Waikato expressway. I have not been involved with the more recent zoning and consenting and implementation of the centre.
- (q) Whilst not involved from a plan change perspective, I have assisted with the development of retail at Te Atatu Town Centre.
- (r) Rotorua Central – I provided advice to the master planning work for redevelopment of Rotorua Central which is a large block of land to the south of the Rotorua town centre.

ATTACHMENT B – Comments on Design Guides

The following provide comments on the detail of the design guidelines. They are examples and not exhaustive, but are provided to highlight some issues to assist with the revision of the guidelines if deemed desirable.

1. RESIDENTIAL DESIGN GUIDELINE

1.1 The residential design guides are helpful to guide ways of achieving the policy (RESZ-P10).

1.2 In reviewing the Residential Design Guide³², I consider that:

- (a) the need to select “relevant” objectives and guidelines is subjective, and I expect an applicant will seek to minimise those that are relevant. All should be considered relevant by an applicant when providing assessment of their proposal, and the respective weight of each should be determined when assessing a proposal;
- (b) reference to the term ‘multi-unit housing’ should be deleted, as the guide will be relevant to developments that are by nature multi-unit (i.e. more than three units on a site) and therefore would remove the need to determine if that section is relevant or not.
- (c) the matters covered in the multi-unit section should be retained as there is good guidance that provides detail on the street interface, for example.
- (d) the guide could be structured to follow RESZ-P10 matters, and specific guidance provided for each zone where the planned built character is expected to be different.
- (e) more guidance is required on the options for the street interface, particularly for apartment buildings illustrating good outcomes. These should include promoting communal or

³² APP3 Design Guide Residential Tracked change version 22July2022

community activities which could include open space provision at ground level which can more easily interact with the street than private units; encourage raising ground level of private units to avoid members of the public on the street from looking down on people seated outdoors in front yards; or if private open space, provide options to manage the inherent conflict of providing a relationship with the street and privacy. It could also address how commercial activities at ground floor level could be incorporated into an apartment building to provide optimal outcomes.

- (f) guidance on placement of buildings with focus on fronting a street and providing outlook over rear yards on the same site.
- (g) provide positive guidance on how to design taller buildings and the issues that need to be dealt with when designing or assessing a building that is taller than a height standard, rather than the negative tone within C7 O7 and G7a. Remove the need to work out whether a proposal is “conspicuously tall” by deleting these terms.
- (h) provide guidance to support the planned outcomes which could include being positive about buildings defining and visually dominating the street edge (collectively) in the HRZ for example.
- (i) adjust the guidance to assist with the design of elements that are already covered by standards and are aligned with them for example, A2 G2a suggests the entry to all ground floor units should be at the street edge so they face or are directly visible from the street. The standard HRZ-S4 requires such a building to be set back from the street boundary by at least 1.5m, so therefore it could be argued that the units are not “at the street edge” in the strict interpretation of the guide. This is one outcome which is perhaps more relevant to a terrace typology, however many apartment buildings have

one main front door and individual doors from within to each unit. These options should be provided in the guidance.

- (j) I suggest better guidance is included on how planting can contribute to the street interface and internal spaces. For example, trees and shrubs will provide a better contribution to the street interface of apartments than lawns. There are very few examples of good planting at the street interface for apartment buildings and the guidance might differ between the HRZ and the MRZ zone, where the latter is more suburban, more green and might even suggest bigger set backs to the front boundary for example.
- (k) The guidance might also discuss the issues for consideration when a building is proposed within the front yard, such as whether this is a commercial offering to the street, or in an area where an alignment with other buildings is desirable for example.

2. COMMERCIAL DESIGN GUIDELINE

2.1 In addition to my comments on the residential design guidelines, I consider that improvement to the guidelines for the commercial zones should be undertaken and I provide some ideas as follows.

- (a) There is a lot of repetition of the same guidance across all the guides and this could be simplified, so that there is no need to repeat the residential guidance unless the residential outcome should be different.
- (b) The guides need to be very clear on the appropriate outcomes to avoid various interpretations, along with examples illustrating a range of good outcomes.
- (c) In this regard, the guidance for residential activities in centres should encourage apartment buildings rather than town houses or terraces, which by virtue of their form, are at ground level. Such an outcome does not achieve the

objective of the Local Centre zone for example, which is primarily for commercial activities, to service the daily and weekly retailing needs of the surrounding residential catchment. Residential and community activities are to be accommodated but should not be at the expense of commercial activity.

- (d) Guidance for residential activities in apartment buildings is going to be the same regardless of the zone, so this can be a standalone document and can be referred to if relevant.
- (e) The key aspects of the arrangement or location of activities in relation to one another should be included as specific guidance for each centre. For example, if residential is proposed in the local centre it should be above the ground floor regardless of whether the frontage is to a primary street. G5. 1c provides advice to this regard but does not go so far as to say that residential at ground floor should be excluded.
- (f) The Local centres are generally surrounded by residential zones where I would expect a focus on providing high quality pedestrian amenity, and the guidance should provide a clear direction that car parking in the front of a local centre site is not suitable. G2. 1b third paragraph states that in "*Some local commercial centres might accommodate offstreet parking at the frontage or at the side of the building*" it does not then go on to say where this might be appropriate for example. Rather than saying the park needs to be landscaped as in G2.3a, the guidance could seek that this outcome is a last resort after all other alternatives have been exhausted.
- (g) The use of the term "conspicuously tall" is used in a number of the guidelines and generally seeks to avoid bulky large dominant buildings. I suggest that more positive language is used for encouraging tall buildings in the MCZ for example where there is an expectation that the built form will be visible

and used to create the public spaces. All buildings over the height standard will require assessment and the guidelines should assist with achieving an appropriate outcome.

- (h) I agree that wind can affect the amenity of a place, and the design of buildings should consider this, however, there is no guidance on what effects are considered to adversely affect amenity. I am no expert in wind effects, however.

Refer to separate attachments as follows

ATTACHMENT C - Porirua Metropolitan Centre height model

ATTACHMENT D – Mana Centre height model

ATTACHMENT E – Height in Relation to Boundary case study

ATTACHMENT F – Adjusted Zone Maps