

Under

the Resource Management Act 1991

In the matter

of the Central Hawkes Bay Proposed District Plan

Statement of evidence of Nicholas Rae (Urban Design)

17 March 2022

Hearing Stream 2 – 30 March 2022



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1. EXECUTIVE SUMMARY

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 have been engaged by Kāinga Ora-Homes and Communities (“**Kāinga Ora**”) to provide evidence on primary and further submissions to the Central Hawke’s Bay Proposed District Plan (“**PDP**” and “**the Plan**”).

1.2 In summary;

- a. I support Kāinga Ora’s submission relating to including reference to the planned outcome throughout the Plan. The Plan is enabling growth and development opportunities and therefore any development should contribute to a planned outcome for the urban areas.
- b. I support altering the objectives and policies to add clarity in terms of the desired outcome, and the suggested references to “planned built form outcomes”. The descriptions for the zones are useful, however in my experience, they don’t hold much weight when considering Discretionary or Non-Complying activities. It is the objectives and policies that are critical to include sufficient direction supported by the standards. I understand the desired outcome is similar to existing character in the residential zones with a building bulk and open space relationship with vegetation, but with a greater range of building typologies and dwelling size opportunity. Buildings up to two levels in the General Residential zone are anticipated. I support the recommended changes as detailed in Appendix A to the evidence of Mr Campbell.
- c. Likewise for the commercial zone, I generally agree with the changes proposed by the reporting planner and Mr Campbell to the Introduction, and objectives and policies, particularly the removal of reference to maintaining existing form and character, or amenity. I provide some comment on specific standards as discussed in evidence below.
- d. The zone standards need to set a basic development framework that achieves the planned outcome and manages effects efficiently and effectively. Following my

analysis and in my opinion, the standards in the notified Plan are not the most appropriate.

- e. My analysis of the PDP General Residential zone (“**GRZ**”) confirms that there is a very high building coverage potential at around 60% to 65% of the site area for one dwelling. The potential building coverage actually decreases when two or more dwellings are proposed on a site and compliant with the outdoor space requirements. I recommend that a building coverage standard is included at 50% so there is an expectation that buildings could occupy half of the site area. This is important in terms of planned outcomes to ensure there is ample open space on a site, and also for managing the bulk of additional dwellings on a site.
- f. Some district plans also include a minimum landscaped area to ensure that vegetation on each site results. I am not convinced such a standard is required for Central Hawke’s Bay given planting and/or grass generally occurs.
- g. The PDP Outdoor Living Space standard (GRZ-S6) for ground level dwellings is very large ($80m^2$, continuous and with a 5m minimum dimension). I consider this standard was proposed to ensure a reasonable area of open space is achieved on each site as there is no building coverage maximum standard. The recommendation above to include a building coverage standard, addresses this with a minimum non-built area of the site. The minimum area for liveable outdoor space should then be enough for a table and chairs and BBQ for example, or for occupants to ‘live’ outdoors. In other district plans this is $20m^2$ as a minimum, but in others it is $50m^2$. There is no exact science on this issue, but the areas generally respond to existing outcomes. The standard should require a minimum, people can then decide how much more space they would desire and whether additional separate spaces are desirable. I recommend that the Outdoor Living Space standard is adjusted to $20m^2$ with a minimum dimension of 4m for any dwelling including a minor dwelling, in conjunction with the recommended building coverage standard.
- h. The Outdoor Service Space standard (GRZ-S7) requires a $15m^2$ continuous area with a 3m minimum dimension. This is a very large area which may not be needed and being continuous limits options for the location of service type activities. For

example, the most suitable location on the site for rubbish bins or wood storage, may not be the most suitable for a clothes line. The 50% building coverage recommendation enables space for these activities, and I therefore consider the standard is not required.

- i. I partially support Kāinga Ora's submission seeking an increase to the height standard (GRZ-S2), and support the adjusted relief now sought as included in Appendix A of the evidence of Mr Campbell of 8m + 1m for roof form. This provides flexibility and encouragement to provide a variety of roof forms.
- j. Kāinga Ora submitted on the Height in Relation to boundary standard (GRZ- S3) seeking clarification on its application to the side and rear boundaries of a site, and to increase the height from 2m to 3m to the point at which the recession plane begins. I support this submission. Enabling buildings to define the edge of streets without a recession plane restriction is a positive urban design outcome, encouraging building to the front of a site while providing for good sized rear yards. The additional height of the recession plane assists with enabling two level buildings that are at less risk of being designed to fit within the standards. The additional text proposed at GRZ-S3 (3) (which does not require the HIRB standard to apply to a common wall) is supported to enable duplex typologies in support of the polices seeking to enable a range of typologies.

2. INTRODUCTION

- 2.1 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 24 years experience in this field in New Zealand, the United Kingdom, France, Portugal, Saudi Arabia, and Australia.
- 2.2 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 and implementation of development projects.

- 2.3 I have been involved in a number of plan review and plan change processes, including the Independent Hearings Panel (“IHP”) hearings on the proposed Auckland Unitary Plan (“PAUP”), and recently on the Proposed New Plymouth District Plan, a plan change to the Tauranga District Plan, and three private plan changes for growth areas in Auckland.
- 2.4 My experience and qualifications are set out in Attachment A to this evidence.

3. MY INVOLVEMENT

- 3.1 I am providing evidence in regard to matters raised in the submissions made by Kāinga Ora relating to the proposed Residential and Commercial zone provisions.
- 3.2 I was not involved with providing advice to Kāinga Ora when it prepared its submissions.

4. CODE OF CONDUCT

- 3.1 Although this is a Council hearing, I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court’s Practice Note 2014. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving evidence. Except where I state that I am relying on the evidence of another person, this written evidence is 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 in this evidence.

5. SCOPE OF EVIDENCE

- 5.1 The scope of my assessment and evidence is limited to the scope of the submission points made by Kāinga Ora.

6. ASSESSMENT METHODOLOGY

- 6.1 To assist with forming my opinion, I have reviewed:
 - The Kāinga Ora submission

- The Section 32 report – Urban Environments (relevant sections)
 - The Section 42A report – Urban Environments (relevant sections)
- 6.2 Due to being located in Auckland during this unprecedented time of the COVID pandemic and without good accessibility to Central Hawke's Bay recently, I have had to use Google Streetview to understand the existing context of the three settlements. I accept this is not the best solution however for the matters the Plan is dealing with, I expect that a physical site visit would not change my opinion.
- 6.3 I have reviewed the RPS in terms of urban form to gain an understanding of what the district plans need to give effect to.
- 6.4 I have undertaken analysis of the notified Commercial zone and General Residential zone provisions to understand what development opportunities would likely exist and identify any issues.
- 6.5 I have tested the outcomes sought by the Plan for the General Residential zone along with a comparison with the Kāinga Ora submissions with assistance from Mr Namiki who is a registered Architect in my office, who produced the drawings and diagrams in my attachments under my instruction. This resulted in providing advice to Kāinga Ora and Mr Campbell.
- 6.6 Following this work and in preparation for drafting this statement of evidence, I have reviewed the draft tracked change version of the General Residential zone and Commercial zone as attached to the evidence of Mr Campbell, provided feedback and discussed the options.
- 6.7 I have reviewed the District Plans of Napier, Hastings and Masterton to understand how bulk and location matters are addressed in the wider surrounding area, where the scale and character of development have similar attributes, albeit that those are larger towns.

7. PLANNING CONTEXT

- 7.1 My considerations are within the context of the proposed zones and the objectives and policies for these zones. The Section 32 Report sets out the planning context and I rely on that.

8. SITE CONTEXT

- 8.1 The PDP relates to the entire settlements of Waipukurau, Waipawa, Otane.
- 8.2 The existing physical context of Waipukurau is characterised by low density residential dwellings, generally single storey detached buildings, but with some two storey dwellings, with trees adding to the overall height of elements and gardens adding to the green suburban type character typical of small rural service towns in New Zealand. The streets have a variety of widths with an assumed low level of activity in the residential areas. Many of the streets do not include street trees, and therefore the spatial definition of the street is determined by the private buildings and the vegetation and front fencing solutions provided by adjacent lot owners. Front fencing is generally low and support good urban design principles of enabling visual connections between the street and the dwellings. The town centre is situated close to the Tukituki River, although the main street is located at a distance from this natural feature where the amenity values normally associated with streams and rivers are not able to be appreciated by people when in the main street environment. Development has focused on the three main roads that head in a southerly direction. The town includes supply outlets and a supermarket, set beyond the main street (Ruataniwha Street). The main street includes a well defined street edge both sides with mostly single level buildings to the street boundary and canopies over the public footpath with parapets above generally. There are a few two storey buildings, some of which appear to have historic qualities. Industrial activities exist near and to the west of the railway interfacing with rural land beyond, the aerodrome. The small residential settlement of Hatuma exists slightly removed and to the west of the aerodrome. The elevation of the town in some locations provides for views to the wider rural context which is expected to be an amenity value.
- 8.3 Waipawa has similar characteristics but much smaller with significantly less commercial main street type activities and industrial type activities located close to the centre alongside the railway surrounded by residential.
- 8.4 Otane is significantly smaller again flanking either side of the railway with very limited commercial offering.

9. GENERAL RESIDENTIAL ZONE

Objectives and Policies

- 9.1 I have reviewed the objectives and policies as recommended in the s 42A report and the further adjustments proposed by Mr Campbell. I support the wording as now included in Appendix A of Mr Campbell's evidence as these provide further clarity on what the zone is seeking to achieve particularly around the future built form outcomes. These include the acknowledgement that towns and cities change over time and the status quo is not required to be maintained.

Testing of the PDP Standards – Site less than 700m²

- 9.2 In order to understand the building envelope opportunity as provided for by the proposed Plan standards, I have selected two sites somewhat randomly, but with the criteria of having one detached house on a relatively standard size and shape lot, and not adjacent to each other such that shading from the building envelope falls on an assumed flat ground plane on neighbouring sites.
- 9.3 The approach of the proposed standards is different to other Plans I am familiar with. The standards seek to ensure there is a minimum amount of open space on a site regardless of the site size. This is suitable when considering how much open space people need for their daily lives, but does not assist with an understanding of expected building scale.
- 9.4 Attachment B illustrates two scenarios on a site at 71 Racecourse Road, Waipukurau. Drawing SK01 illustrates that the maximum building coverage resulting from the required outdoor spaces and yards with outdoor parking for two cars as contained within the notified standards of the proposed Plan for one dwelling is 61% on a 512m² site. I note this is only one configuration of many as the Outdoor Living Space and Outdoor Service Space requirements could be designed in many different locations. It also assumes that the yards can be part of the Outdoor Living Space and Outdoor Service Space. This is very high for a planned outcome of one to two level buildings and an open low-medium density environment.
- 9.5 There is no impervious coverage standard so 100% of the site could be impervious.

- 9.6 Drawing SK02 illustrates the same site as above with the addition of a minor dwelling complying with GRZ-S1 (2b) where the minimum net site area for a dwelling with a gross floor area (“GFA”) less than $60m^2$ is $150m^2$ (the site is not large enough for two permitted dwellings complying with the density standard of one per $350m^2$). In this case, the main dwelling has $70m^2$ footprint and it is likely that a second level of the same size would occur, resulting in a $140m^2$ GFA dwelling. The second (minor) dwelling has a GFA area of $58m^2$. For both dwellings, two car parks each are proposed external to the building and the design is subject to vehicle manoeuvring testing. The building coverage in this scenario is 25% (and could be around 32% if a garage was built for the larger dwelling).
- 9.7 The Plan essentially provides for less building coverage per site when more than one dwelling is proposed. This is due to the requirement of large individual outdoor spaces per dwelling. Typically, larger dwellings have the ability to house more people than minor dwellings and therefore the size of outdoor spaces can vary. This is recognised in the Plan and Minor dwellings have a $30m^2$ (min) Outdoor Living Space requirement compared with the standard of $80m^2$ for dwellings.
- 9.8 It was difficult to arrange the buildings and outdoor space in the SK02 example to comply, particularly as the density requires compliance with $150m^2$ and $350m^2$ minimum net site areas respectively.
- 9.9 We found the definition of net site area confusing especially where in the SK02 example there is only one site with two dwellings proposed on it. It therefore does not have a rear site or legal access to a rear site as per the definition of net site area. The driveway to the dwelling is therefore included in the net site area assuming no proposed subdivision.
- 9.10 The design outcome is significantly restricted by the outdoor space requirements and may not achieve the most suitable outcome, or provide options.

Testing the PDP Standards - Site greater than $700m^2$

- 9.11 The second site selected to test is at 2A Freyberg Terrace, Waipukurau. This is just over $700m^2$ total site area, selected as it enables two dwellings to be built complying with the $350m^2$ net site area for each.
- 9.12 Attachment C, drawing SK03 illustrates the maximum building coverage possible for one dwelling on this site (65.7%) assuming the two car parks are external to the building. If

car parking is housed in the building then slightly more building coverage would be permitted. I consider that these standards do not “maintain and enhance” (noting the point made about that phrase by Mr Campbell) the character and amenity values of the residential environment as recommended by the reporting planner in GRZ-03 as the existing actual building coverage is much lower.

9.13 Attachment C, drawing SK04 illustrates two dwellings on this site, the required outdoor spaces and a driveway to service four external car parks. This assumes no subdivision consistent with example one above. The building coverage in this scenario is 35%, and could be greater if the car parking spaces are housed within a garage (45.2%).

9.14 These could result in rather large dwellings especially over two levels, however illustrates a suitable built area and open spaces.

9.15 If a third dwelling (or a minor dwelling) was added, then the footprints would be smaller again and likely that two levels would be required. As three dwellings on a site would require consent, matters for consideration in terms of building bulk, and amenity include, for example:

The degree to which the proposed buildings:

- a. will be compatible with the character and amenity of the area, including the nature and scale of other buildings in the surrounding area;
- b. will overshadow adjoining sites and result in reduced sunlight and daylight;
- c. will cause a loss of privacy through being over-looked from neighbouring buildings;
- d. will block views from properties in the vicinity, or from roads or public open space in the surrounding area;
- e. will diminish the openness and attractiveness of the street scene;¹

9.16 Given the possible scale of building bulk as provided for in the (as-notified) permitted baseline of one dwelling (as per SK03), it would be difficult to say that three dwellings would have any greater impact on the matters listed above.

9.17 I expect that this outcome was not anticipated in the PDP, as I have interpreted the assessment criteria to suggest there is an expectation that higher density will result in more building coverage and/or bulk.

¹ Refer GRZ-AM1

- 9.18 In my opinion, the permitted baseline should set an expectation for building bulk where the impact of such building is considered acceptable. This sets a building to open space relationship that will contribute to the character of a street, or block. Typically, if an applicant were to add to the building bulk, it would require assessment.
- 9.19 The testing illustrates that around 45.2% building coverage on a 701m² site is about the same as the outcome created by the Outdoor Space requirements for two dwellings. For suburban type outcomes the building coverage is typically around 35% - 45%. The National Planning Standards (“NPS”) includes 50%. The Kāinga Ora submission is 50%, in line with NPS. This is a reduction from what PDP could achieve in the order of around 15%.
- 9.20 A building coverage of 50% is reasonably high and a slightly lower percentage may better achieve the planned outcome (being the term proposed by Kāinga Ora), however in light of the NPS and the high coverages the PDP would enable, I consider consistency with the NPS to be appropriate.
- 9.21 I also support two dwellings as permitted and more than two requiring consent as it incentivises additional dwellings within the exiting urban areas supportive of a compact urban environment². There are areas where some standards may not be complied with (depending on the size of the existing sites being developed) when increasing the density. In such a case, more scrutiny over the design aspects of a development are valid as provided for in the PDP assessment matters.

Density

- 9.22 The Kāinga Ora submission sought to delete the residential density standard (GRZ-S1) for more than one dwelling on a site.
- 9.23 The reporting planner highlights an important point, that if the density standard were to be deleted, a site of 350m² net site area, existing or created through subdivision, would generally allow twice the density of residential development in the zone from what is proposed³. This being two dwellings on a 350m² site rather than one as proposed.

² Urban environment generally, not as defined in the NPS:UD

³ S42A Report Para 5.3.15

- 9.24 This point is appreciated, and I consider is mostly related to infrastructure capacity, but could have an impact on character and amenity. I agree with Kāinga Ora's submission that a better way of managing amenity and character outcomes is through building envelope standards, rather than density.
- 9.25 As an alternative to deleting the standard, respecting the potential infrastructure issues, it is recommended that the site area per dwelling be adjusted to one dwelling per 300m² net site area. This would avoid the outcome highlighted by the planner above as two dwellings would not be a permitted activity on a 350m² site assuming no change to the subdivision minimum site size.
- 9.26 This would allow two dwellings to be provided for as a permitted activity on a 600m² site, rather than a 700m² site without subdivision. This enables intensification without the need for subdivision where the built form could utilise common walls and avoid the need to comply with yards and height in relation to boundary standards that would otherwise apply to each individual site along a common boundary if they were subdivided. This could result in larger continuous areas of open space on a site. This outcome could be better than two individual buildings on their own sites complying with the bulk and location standards which would apply to smaller sites created through subdivision.
- 9.27 Subdivision could potentially result in an access driveway to a rear site and as this driveway area is excluded from net site area, the parent lot would then need to be larger than 700m² to achieve two dwellings.
- 9.28 The proposal to use a building coverage standard ensures that the same building footprint to open space ratio applies regardless of whether the site is subdivided or not.
- 9.29 In terms of the impact on the streetscape amenity and character, it is possible that a distinction may not be appreciated between two dwellings on a 600m² site, or two dwellings on a 700m². This is because the ability to experience an additional 100m² of land at the rear of the site from the street may not be possible.
- 9.30 I consider that reducing the standard to one dwelling per 300m² provides the opportunity to intensify a greater number of existing sites, however the extent to which the opportunity will be taken up is not known. The number of additional dwellings might not be any different to an outcome provided for by one dwelling per 350m², it just provides

greater opportunity. It also provides an opportunity for a slightly smaller offering to the market to assist with providing for a range of dwellings in support of GRZ-O1.

- 9.31 I support the reduction of the net site area to 300m². It will provide additional housing opportunities without compromising the overall amenity of adjoining sites.

Height

- 9.32 Kāinga Ora's submission sought an 11m height standard in the GRZ. This is too high in my opinion as it would enable three level buildings, rather than the planned outcome (Kāinga Ora's preferred term) of two levels in a variety of forms and sizes as per the recommended adjustments to the GRZ Introduction and Policies by Mr Campbell. These adjustments build on the proposed adjustments to the GRZ Introduction by the reporting planner who recommends including clarity that the predominant residential character is contributed to by one to two storey dwellings.
- 9.33 A variety of one and two storey dwellings would be consistent with the existing amenity values within the existing context, and this form would not be considered out of character.
- 9.34 I therefore recommend that the PDP of 8m be retained, but in addition, enable roof forms to 9m, limited to 50% of the roof area where a sloping roof is proposed. This enables and encourages sloping roof forms to add to the character of the streetscape and provides flexibility on sites with uneven ground or where floors levels need to be raised. This provides for a slightly higher built form outcome opportunity than the Large Lot Residential zone (8m), but lower than the Commercial Zone (12m).

Height in relation to boundary

- 9.35 Kāinga Ora submission sought an increase to where the height in relation to boundary recession plane begins, from 2m to 3m above ground on the boundary.
- 9.36 The s 42A report sets out a good explanation of the implications and I agree with the dimensions included in paragraph 5.3.52 for potential height of buildings relative to boundaries. I also agree with the statement: "*Visually, I consider that there is unlikely to be a significant noticeable difference*"⁴ referring to the additional 1m height enabled by

⁴ S 42A Report – para. 5.3.53.

the Kāinga Ora submissions. The s 42A author goes on to say “ I am *uncertain how the requested amendments to GRZ-S3 could affect/ cause shading of adjoining properties*”⁵.

- 9.37 In order to support the Kāinga Ora submissions and to assist the commissioners on this matter, sections through three example sites with different site widths and are included in Attachment D. These widths are selected as representative of typical existing sites of around 15m, 18m, and 20m. The 2m+45° recession plane is illustrated in red, and the 3m+45° in green. These diagrams assume a flat site and are cross sections through each site. They also include the 8m and 9m height limits to assist with understanding the proposed additional building envelope proposed.
- 9.38 The additional height in relation to boundary proposed enables a larger building envelope, which provides more flexibility for the design of upper levels of buildings. This is most useful on narrower sites.
- 9.39 I have also instructed the preparation of basic shading diagrams to understand how this additional building envelope may impact on sun light access to neighbouring sites, which I have analysed.
- 9.40 The diagrams are illustrated in Attachment E – SK06 and use the sites at 71 Racecourse Road and 2A Freyberg Terrace, Waipukurau. These sites illustrate different orientation to north. Three different building envelopes have been used to enable a comparison of the impact of shadow on neighbouring sites. I note that the above recommendation of 50% building coverage will mean that not all of the illustrated building envelope in these diagrams would be built. The building envelope provided for does not specify where buildings should exist. The impact on neighbours could be less than illustrated depending on where buildings are actually located, their design, and the application of a maximum building coverage standard.
- 9.41 The diagrams illustrate shading at various times of the day in Spring (22nd September – Equinox). The additional height (9m) and the 3m starting point for the recession plane results in additional shadow potential on neighbouring sites. The difference is considered minimal through the core part of the day, with a larger difference occurring at the beginning and end of the day. For example, at 4pm in September the length of additional shadow resulting from the 9m height limit and 3m+45° HIRB recession plane is

⁵ S 42A Report – para. 5.3.53.

approximately 2.3m (assuming level sites) compared to the 8m height limit and 2m+45° HIRB recession plane. This is illustrated on Attachment E – drawing SK07 where the extent of shading from the three models is combined.

- 9.42 The additional impact is not significant and retains a significant amount of sunlight access to neighbouring sites during the day, and together with a 50% building coverage restriction will result in good sunlight access.
- 9.43 There is no exact standard or requirement for sun light access to a site and the amount of sun light people desire differs. Assessment criteria in the Auckland Unitary Plan includes whether four hours of sunlight is retained between the hours of 9am – 4pm during the Equinox (22 September) to outdoor living spaces⁶.
- 9.44 In the absence of a national standard on this issue, the Auckland Design Manual includes a rule of thumb which states "*All private open spaces should receive at least five hours of sunlight across at least half of the garden, courtyard, balcony or roof terrace, as measured on the equinox (22 March / September). Design and orientate all principal living spaces, which are directly accessible from private open spaces, to receive maximum sunlight admission, as measured at the equinox on 22 March / September.*"⁷
- 9.45 I consider that the examples illustrate that these two different criteria can be met and therefore I support the proposed 3m origin point for the recession plane as proposed in the attachment to Mr Campbell's evidence. I also support the reporting planner where it is stated that the height in relation to boundary standard is simple to apply.⁸
- 9.46 For comparison purposes, the Main Residential zone in the Napier District Plan includes a 3m+45° HIRB standard; All Hastings Residential zones except the City Living zone includes a HIRB standard of 2.75m+(between 35 and 55°), the Hastings City Living zone includes a 3m+45° and 55° HIRB standard, the Residential zone in the Wairarapa Combined District Plan – Masterton 2021 Edition includes a 3m+45° HIRB Standard. The recommended standard above is consistent with other towns in the surrounding area.

⁶ Auckland Unitary Plan H4.8.2(4)

⁷<https://www.aucklanddesignmanual.co.nz/sites-and-buildings/terraces/guidance/placing-the-building/designing-light-sun>

⁸ S 42A Report – para. 5.3.53.

10. COMMERCIAL ZONE

- 10.1 I generally agree with the changes proposed by the reporting planner and further adjustments recommended by Mr Campbell to the Introduction, and objectives and policies, particularly the removal of reference to maintaining existing form and character, or amenity. The words “maintain and enhance” are generally derived from Section 7 of the Resource Management Act, however they are with reference to amenity values which are defined as those natural or physical qualities and characteristics of and area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.
- 10.2 In terms of the standards, the following relate to the recommended changes by Mr Campbell as set out in Appendix A to his statement of evidence.
- 10.3 COMZ-S2 Height of buildings – Kāinga Ora is no longer seeking an increase to the maximum height.
- 10.4 COMZ-S2 Setback from Roads and Rail Network - This standard is proposed to be changed from a minimum setback for any buildings from road boundaries to a maximum setback of 5m. This is identified as an error by the S42A report⁹. I support this correction.
- 10.5 COMZ-S6 Amenity of Adjoining General Residential Zone - The additional recommended change by Mr Campbell is to the starting point of the recession plane in the height in relation to boundary part of the standard from 2m to 3m.
- 10.6 This is consistent with the recommendation to the HIRB in the General Residential zone. The strategy used is to have the same building restriction on the Commercial zone as a residential site when it adjoins the GRZ.
- 10.7 I note that the standard provides for residential buildings to be 1m from the GRZ but then requires a 2m landscape area along the boundary with the GRZ to screen buildings. If the building is residential in the COMZ, I consider it is not essential that it is screened. An exception for residential buildings to be screened could be included in COMZ-S6(3) if there is scope.

⁹ S42A Report Para. 6.3.31

- 10.8 COMZ-Sx Residential Activities within the Commercial zone - The recommended addition by the reporting planner addresses the concerns about residential activities occurring at ground floor, and requiring private outdoor space for residents. I support the additions, with the minor adjustments recommended by Mr Campbell. I recommended to Mr Campbell that the minimum dimension for an upper level outdoor space should be increased to 1.8m as 1.5m is very tight. The outlook space is important to ensure a suitable level of amenity and privacy for occupants.
- 10.9 COMZ-AM5 Assessment criteria - I have assisted with the refining the recommended criteria proposed by Mr Campbell and agree that this will address a gap in the criteria for residential non-compliances.



Nicholas James Rae

Attachment A – Experience

Attachment B – Notified Building Coverage Potential – 512m² site test.

Attachment C – Notified Building Coverage Potential – 701m² site test.

Attachment D – Height and Height in Relation to Boundary comparisons

Attachment E – Sun Access diagrams

Attachment A

Qualifications and Experience of Nicholas James Rae.

1. 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 with Honours from the University of Sydney (2005) and a Bachelor of Landscape Architecture (Honours) degree from Lincoln University 1997. I have approximately 24 years experience in this field in New Zealand, the United Kingdom, France, Portugal, Saudi Arabia, and Australia.
2. I am a member of the Urban Design Forum, Resource Management Law Association and the New Zealand Institute of Landscape Architects.
3. I regularly provide advice on urban design and landscape matters, followed by urban design and landscape and visual assessments for a range of project types such as:
 - plan changes,
 - visual assessments,
 - residential infill projects,
 - retirement villages,
 - brown field residential and commercial developments,
 - specific design of subdivisions in greenfield areas including the vision for the open space networks and development patterns, and street design
 - specific landscape design for implementation within developments
 - building typology exploration,
 - Design guidelines
4. This range of work has allowed me to understand the implications of the provisions of planning provisions, which assists recommendations for zone provisions within district plans and their interpretation.
5. My recent work has been Auckland region based, however have worked in the Waikato, Tauranga, and Queenstown mostly, and recently in New Plymouth. Example projects where I have been involved are:

Plan Changes

- a) Proposed New Plymouth District Plan – (current) providing advice to Kāinga Ora to assist their submissions to the proposed new district plan assessing viewshafts and development potential within the city.
- b) Tauranga District Plan – (current) providing advice to Kāinga Ora to assist their submissions to the proposed new district plan assessing viewshafts and development potential within the city.
- c) Plan Changes 51 and 61 relating to the Drury area, providing advice and evidence to both hearing panels supporting submissions by Kāinga Ora on proposed provisions.
- d) Matakana Country Park (current) – aligning provisions within a precinct to better provide for destination visitor activities and residential.
- e) Auckland Unitary Plan – assisting a number of clients with submissions and evidence before the independent hearings panel for individual sites such as residential provisions at Kumeu / Huapai and Riverhead, and mixed use sites in Mt Eden,

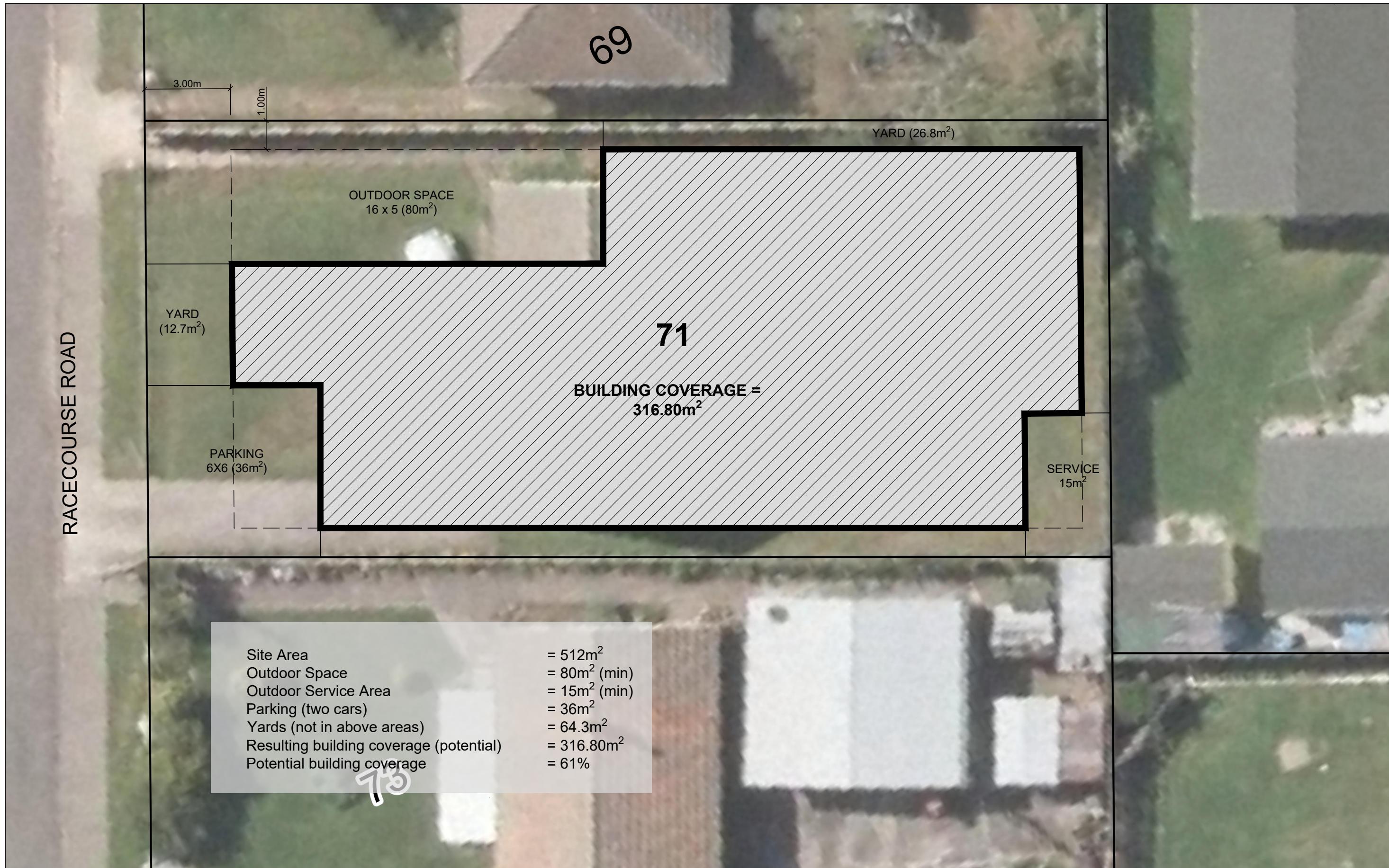
through to significant proposals for settlements at Kingseat, Clarks Beach, and Takanini/Ardmore.

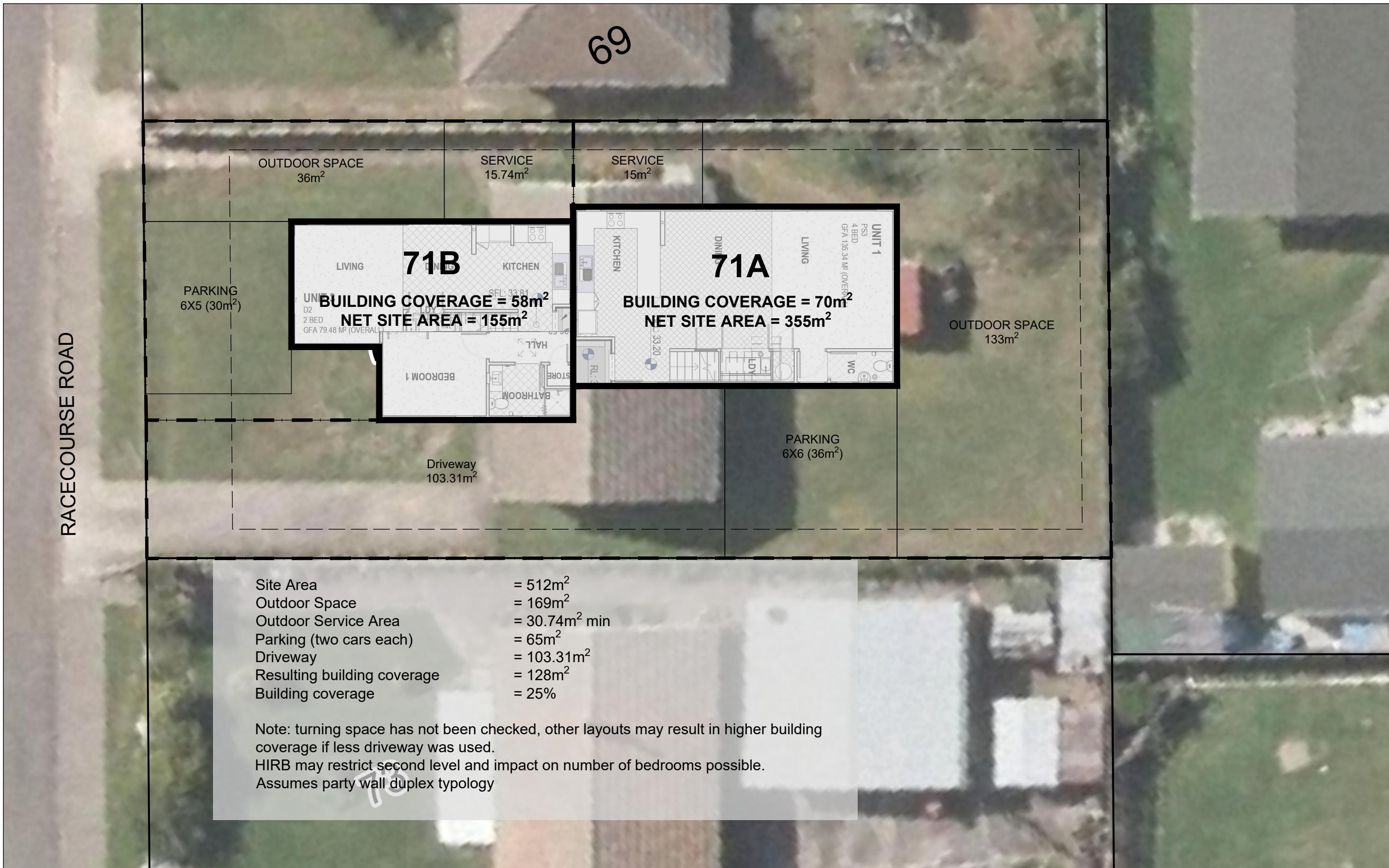
- f) Auckland Unitary Plan – providing a peer review role for some of the submissions made on behalf of the Urban Design Forum.
- g) Clarks Beach Special Housing Area Plan Change – lead consultant for the master planning and plan change proposal preparation and urban design assessment for 50ha of coastal land, with ongoing commitment to assist with implementation. Detailed subdivision design and landscape solutions for streets, a new stream and esplanade reserve.
- h) Silverdale South – Structure plan development for collective landowners of 94ha leading to detailed submissions and urban design and planning evidence to Plan Change 123 to promote a mixed residential and commercial area around the Silverdale Busway Station, supported by recreational opportunities.
- i) Kumeu Town Centre – developing a plan change request for expansion of the Kumeu town centre with structure plan and specific provisions for a mix of commercial and residential development.
- j) Rototuna – assistance to a private major landowner on the proposed urban zoning in north Hamilton and integration with the proposed Hamilton Express motorway extension.
- k) Frankton Flats Queenstown - assistance to a private landowner on the proposed urban zoning for development west of the Queenstown Airport.
- l) Puhinui – Urban design assistance to establish a structure plan for rezoning land to the east of the Auckland International Airport for industrial and business activities.
- m) Ihumatao – Urban design structure planning and development of precinct provisions to provide for industrial activities with specific consideration of local historical importance and relationships to open space networks and a Papakainga settlement north of Auckland International Airport.

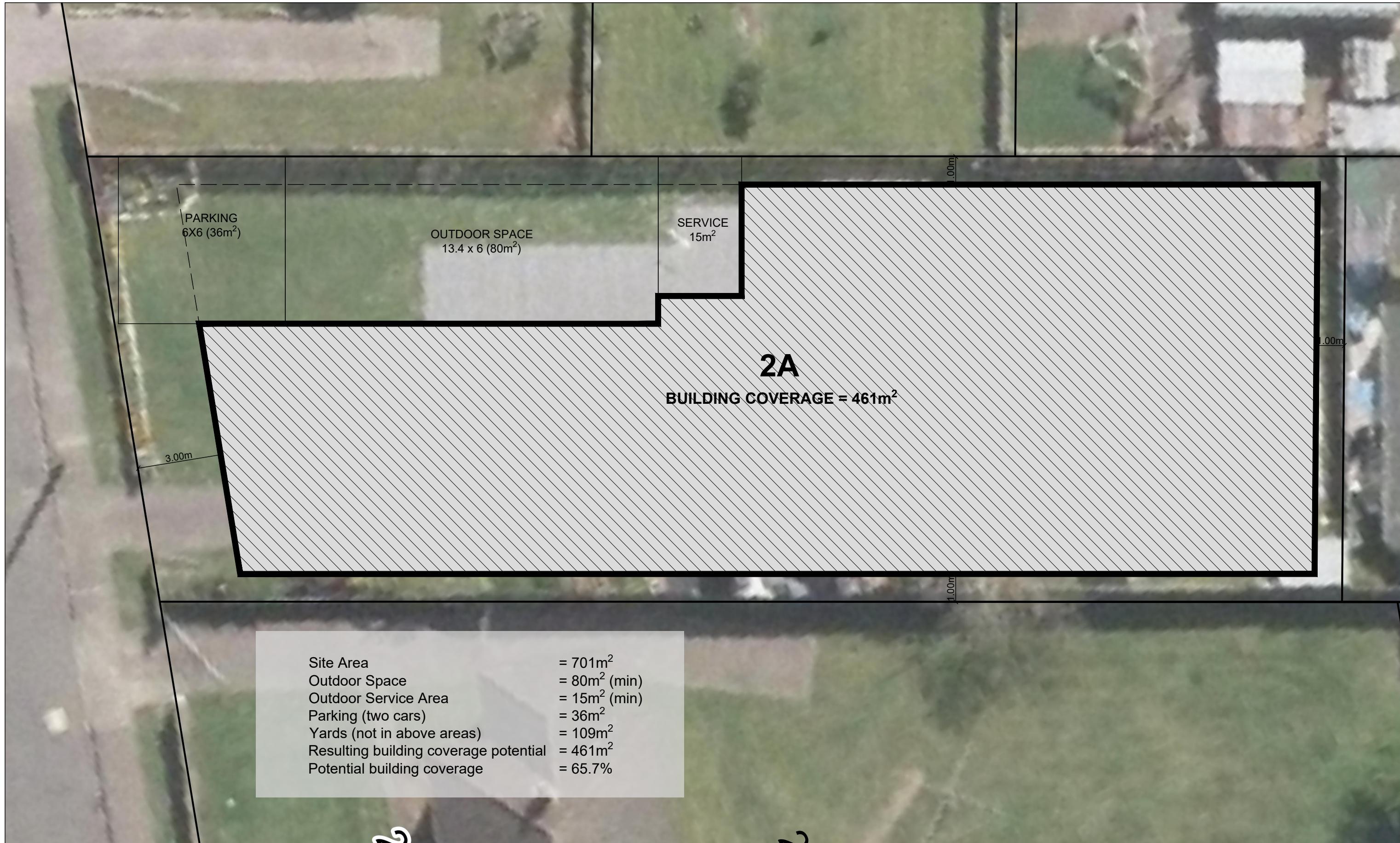
Development proposals

- a) Park Green – a 97ha residential development in Hingaia where we have developed the master plan framework and detailed design and assessment to gain resource consents and oversee the landscape implementation.
- b) The Botanic Retirement Village – urban design advice and assessment, followed by evidence to gain resource consent for 500 unit mixed tenure proposal at Silverdale.
- c) Paraekau Resort - a new high end retirement village on Pararekau Island using design solutions that respond to the site's high amenity spaces.
- d) 30 Sandspit Road, Cockle Bay – a 54 unit Integrated Residential Development proposal on a site zoned Single House. Ongoing urban design and visual assessment and evidence.
- e) 2 Tizard Road, Birkenhead – a 10 unit Integrated Residential Development proposal on a site zoned Single House above Birkenhead Wharf. Ongoing urban design and visual assessment and evidence.
- f) Main Road Huapai - consenting for a new service station and drive through restaurant.

- g) 35 Matakana Valley Road – urban design advice and assessment to support RC application for 4 visitor accommodation units, one retail and one dwelling in the main street of Matakana.
- h) 80ha site in Morrinsville and supported an application for stage 1 for residential, now under construction.
- i) Various digital billboards including developing the methodology for assessing these and the standards being used today.





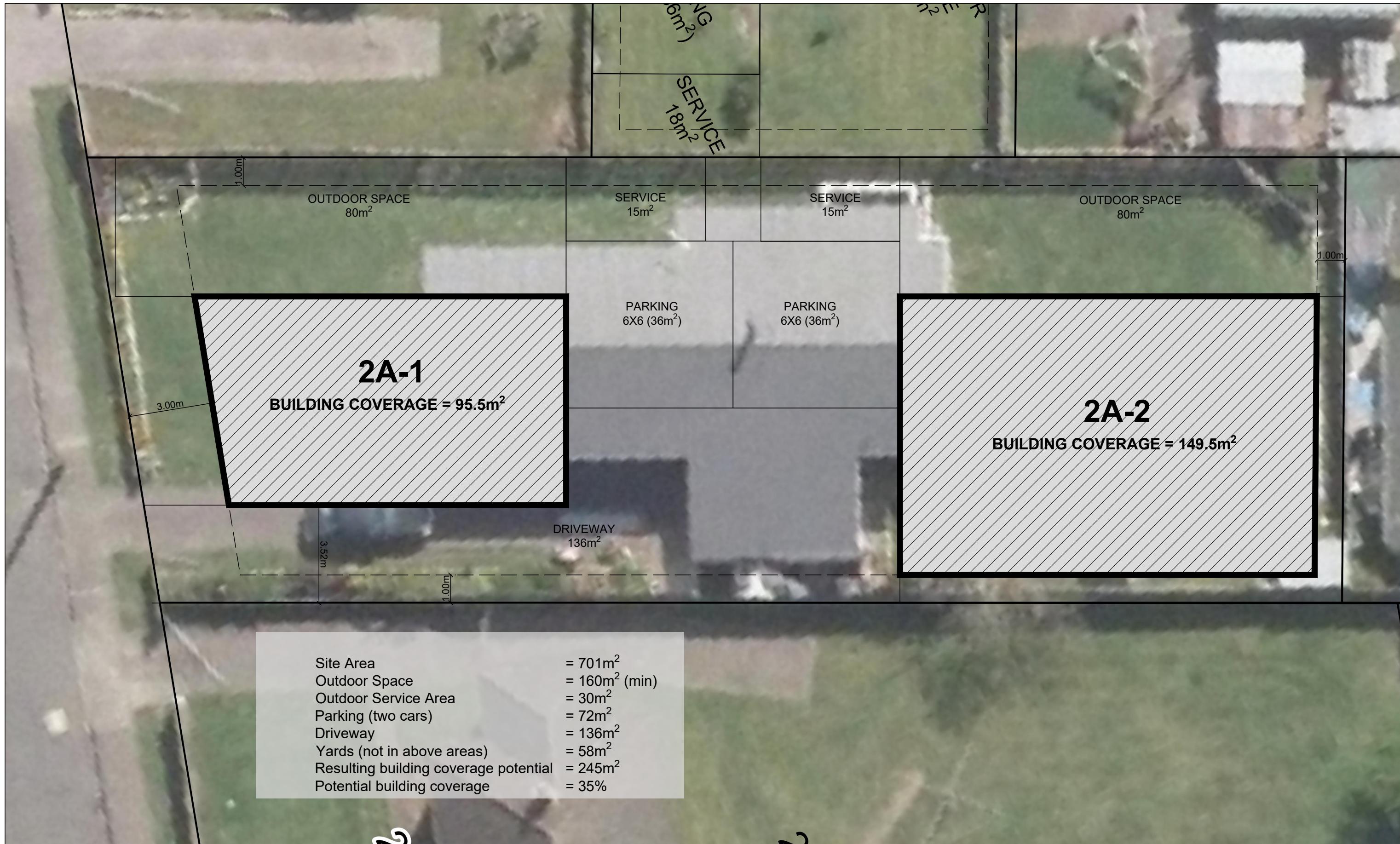


Analysis of Central Hawke's Bay Proposed District Plan
Test Site is 2A Freyberg Terrace, Waipukurau.

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Notified Building Coverage Potential - One Dwelling
Central Hawke's Bay - Proposed District Plan
Scale 1:125 @A3 Date : 17 March 2022

SK03
Rev 1



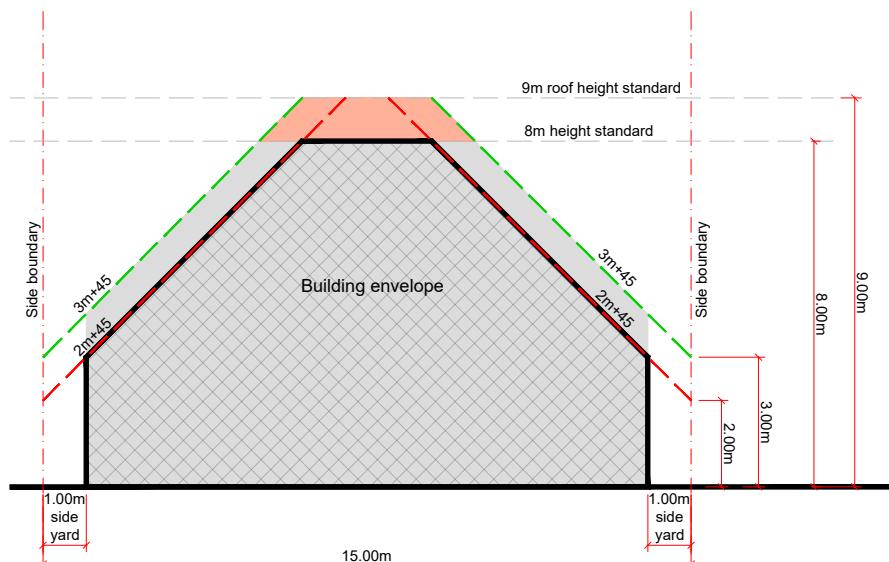


Figure 1
Indicative Section - 15m wide site

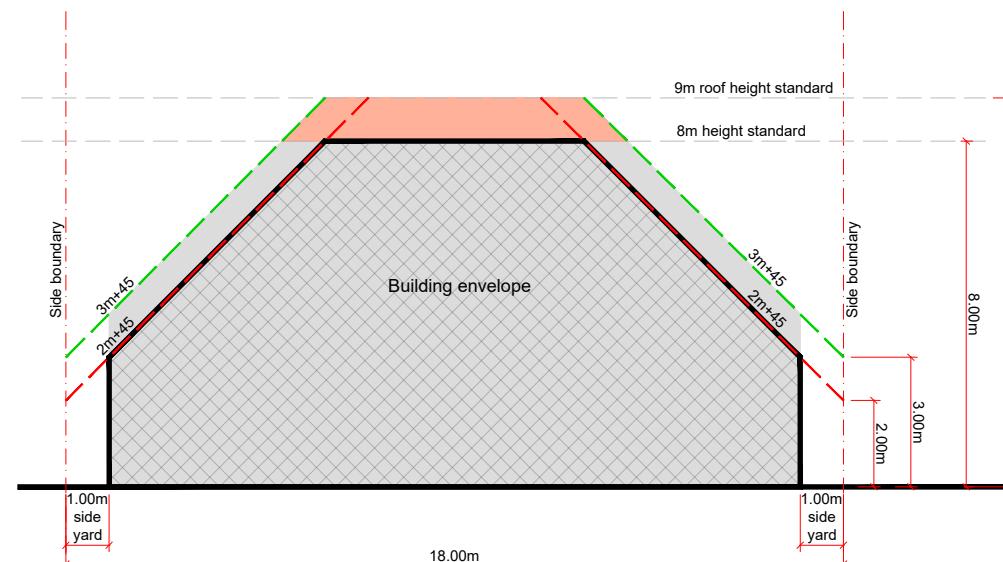


Figure 2
Indicative Section - 18m wide site

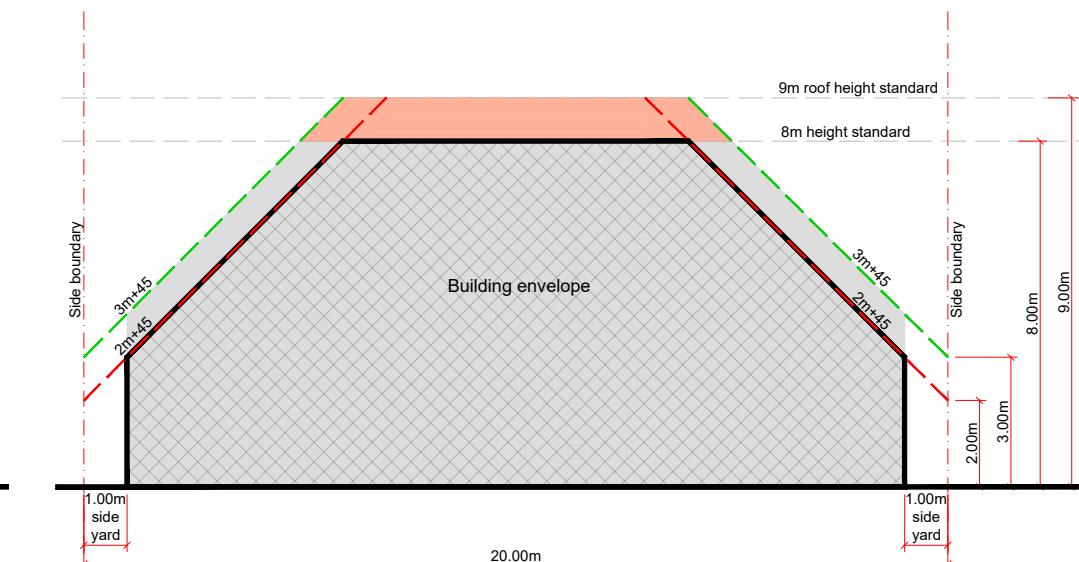
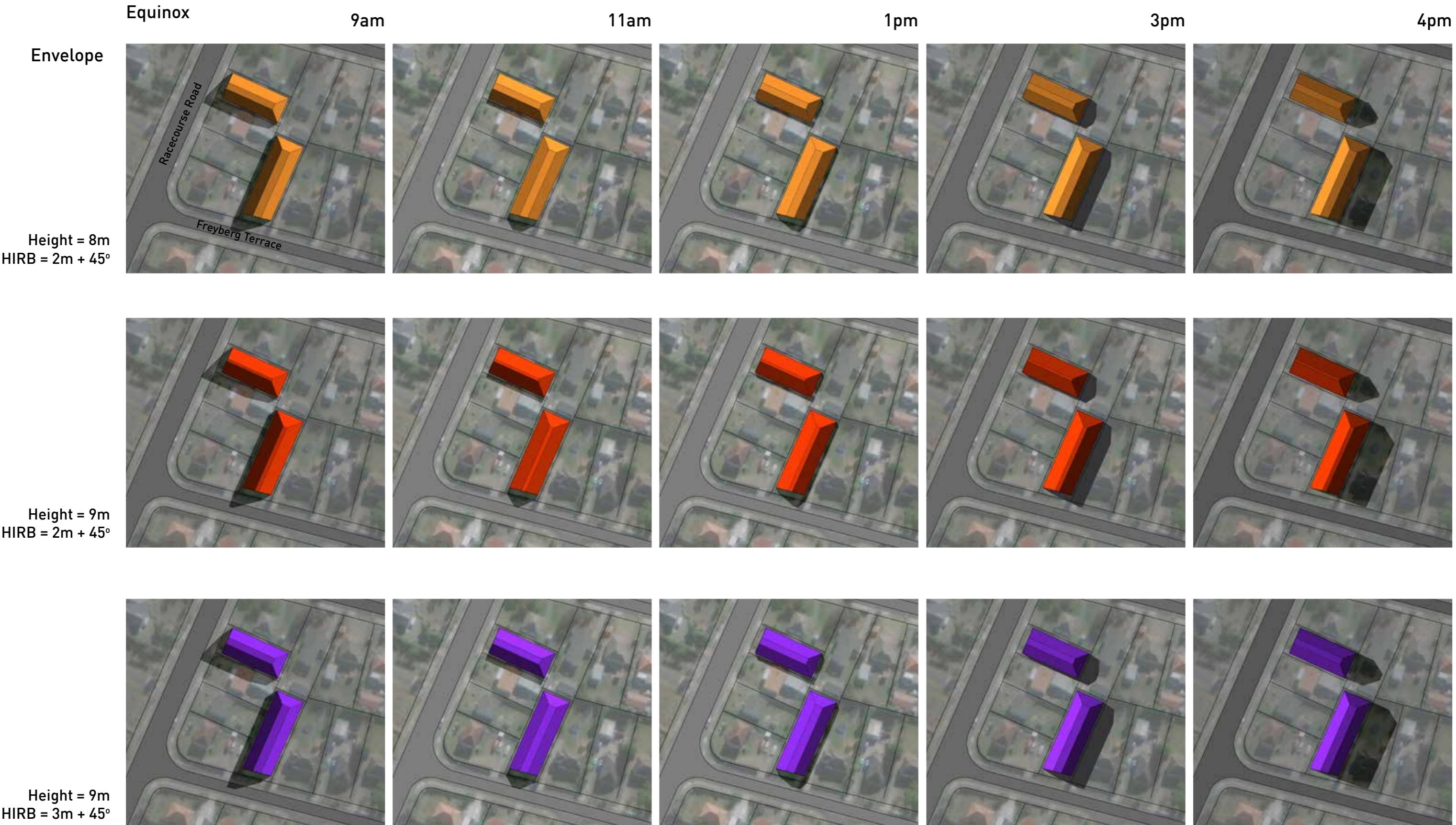


Figure 3
Indicative Section - 20m wide site



Equinox - 4pm

