

BEFORE INDEPENDENT HEARING COMMISSIONERS
IN THE WAIKATO REGION

I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
WAIKATO

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on proposed
Plan Change 26 (residential
intensification) ('PC26') to the Operative
Waipā District Plan ('WDP')

STATEMENT OF PRIMARY EVIDENCE OF CAMERON WALLACE
ON BEHALF OF KĀINGA ORA - HOMES AND COMMUNITIES

(URBAN DESIGN)

6 APRIL 2023

Instructing solicitor:
C E Kirman
Special Counsel
Kāinga Ora - Homes and Communities
PO Box 14594
Central Auckland 1051
E: claire.kirman@kaingaora.govt.nz

Counsel Instructed:
D A Allan / A K Devine
Ellis Gould Lawyers
PO Box 1509
Auckland 1140
E: dallan@ellisgould.co.nz /
adevine@ellisgould.co.nz

1. EXECUTIVE SUMMARY

1.1 My full name is Cameron Wallace. I am a Partner and Urban Designer at Barker and Associates (“**B&A**”). I am providing urban design evidence on behalf of Kāinga Ora-Homes and Communities (“**Kāinga Ora**”) in relation to the submissions it made on the Proposed Plan Change 26 (“**PC26**”) to the Waipā District Plan (“**District Plan**”).

1.2 In summary, the key points addressed in my evidence are:

- (a) The statutory context, as it relates to urban design matters around intensification, created by the National Policy Statement: Urban Development 2020 (“**NPS-UD**”) and Waikato Regional Policy Statement;
- (b) The appropriateness, in urban design terms, of various bespoke amendments to the Medium Density Residential Standards in relation to building setbacks and roof. I consider that these are unnecessary and may give rise to (or indeed promote) poorer urban design outcomes through a reduction in design flexibility;
- (c) The appropriateness, in urban design terms, of the application of a High Density Residential Zone within an approximate 5-minute walking catchment of Cambridge Town Centre. I recommend several amendments to the zone provisions included as part of the original Kāinga Ora submission to respond to relevant contextual factors within Cambridge. This includes amendments to building coverage, building setbacks, height in relation to boundary, and assessment criteria. In my opinion, the inclusion of this zone will help to incentive more intensive development close to the town centre in an area with high natural amenity, will be support centre vitality, providing greater housing choice (in terms of typology and location), and support the use of more sustainable modes of transport.

- (d) The appropriateness, in urban design terms, of provisions relating to Character Clusters and Character Streets. This includes a recommendation for refinements to the provisions of Character Clusters to support for greater levels of intensification whilst subject to a design review consent process. In my opinion, matters of discretion and assessment criteria can be an effective design method to help guide appropriate forms of development whilst providing an option to refuse inappropriate development.
- (e) The appropriateness, in urban design terms, of enabling increased building height within Cambridge and Te Awamutu town centres.

1.3 In my opinion, the package of relief sought by Kāinga Ora will result in improved urban design benefits than those proposed as part of Council's amendments to PC26. They will also better align anticipated design outcomes with the intent of the NPS-UD.

2. INTRODUCTION

2.1 My full name is Cameron Wallace. I am a Partner and Urban Designer at B&A, an independent, specialist urban and environmental planning consultancy.

Experience

2.2 I hold a Master of Urban Design (1st Class Honours) and a Bachelor of Planning (1st Class Honours) from the University of Auckland. I have been a Full Member of the New Zealand Planning Institute since 2014 and am a Member of the NZ Urban Design Forum.

2.3 I have 15 years' professional experience working in urban design and urban planning, gained in both the public and private sector, in the United Kingdom and New Zealand. Since 2018, I have been employed as an urban designer at B&A. In my current role, I regularly assist local authorities and government departments with policy and district plan development in relation to growth management and urban design

matters. I also provide up-front urban design input into a wide range of development schemes for private clients and Auckland Council, including multi-unit residential buildings in both greenfield and brownfield environments as well as more traditional greenfield subdivisions across New Zealand.

- 2.4 Prior to my employment at B&A, I worked for over 3 years as a City Planner, then Principal City Planner, at Transport for London where I assisted in the development of planning frameworks to support residential and employment growth in "Opportunity Areas" across Greater London. Prior to that I was employed by Opus International Consultants as a planner and urban designer where, amongst other projects, I provided extensive urban design and planning advice as part of the Auckland Unitary Plan process on behalf of several Ministers of the Crown, government agencies and private organisations.
- 2.5 Of particular relevance to the matters that will be covered in my evidence, I am or have been a member of urban design and planning teams for policy planning and development projects including:
- (a) Plan Change 9 - Rotorua District Plan, specifically acting as lead urban designer advising Council on implementation of the Medium Density Residential Standards, development of a complimentary High Density Residential Zone and development of non-statutory urban design guidelines;
 - (b) Nelson Resource Management Plan review, specifically provision of urban design advice in relation to the introduction of new Medium Density Residential and High-Density Residential zones and structure planning of identified growth areas of Kaka Valley and Saxton;
 - (c) Queenstown Lakes Proposed District Plan Review, specifically ongoing provision of spatial analysis to inform an urban design review of existing provisions (with a focus on height and density of development) across all residential and

commercial zones to ensure alignment with Policy 1 and Policy 5 of the National Policy Statement on Urban Development;

- (d) Private Plan Change 48 - Drury Central, specifically acting as urban design lead in the proposal to rezone 91 hectares of land in South Auckland from 'Future Urban' to 'Business - Metropolitan Centre', 'Business - Mixed Use' and 'Open Space - Informal Recreation' zones;
- (e) Nelson Tasman Future Development Strategy, specifically provision of strategic planning and urban design advice to Nelson City Council and Tasman District Council in relation to the identification of new suitable land for residential and commercial intensification to meet forecast demand through to 2050. This included a particular focus on understanding the likely uptake and realisation of residential intensification opportunities;
- (f) Mt Roskill Spatial Development Strategy, specifically acting as urban design lead advising Kāinga Ora on the development of a Spatial Development Strategy covering the Mt Roskill Precinct as part of their work in delivering the Auckland Housing Programme;
- (g) SL1 Structure Plan - Future Proof, specifically lead urban designer preparing a structure plan across 438 ha of land on the southern fringe of Hamilton to provide a new neighbourhood centres, open spaces, 110ha of new industrial land and up to 12,000 new dwellings that informed the review of the Hamilton-Waikato Metro Spatial Plan;
- (h) Auckland urban design reviews, specifically acting as a consultant urban designer reviewing resource consent applications for a range of residential, commercial and mixed-use schemes on behalf of the Urban Design Unit; and,

- (i) Urban design advice assessment, specifically provision of urban design advice and assessment for numerous residential, commercial, and mixed-use schemes across New Zealand. This includes residential intensification and town centre development projects in a number of smaller regional cities and towns including Whangārei, Hamilton, Gisborne, Napier, Havelock North, Palmerston North, Whanganui, Nelson, and Ōamaru. This has also included providing urban design advice and peer review for the project team for a 26-unit terraced housing development at 105-161 Ohaupo Road, Te Awamutu.

2.6 In September 2022, I was commissioned by Kāinga Ora to prepare this statement of evidence to address matters raised within the primary submissions in relation to PC26. Prior to this process, I provided initial advice to Kāinga Ora in relation to urban design matters of relevance to PC26. As part of this process, I undertook a detailed desktop study of the settlements within the Waipā District. I then visited Cambridge, Te Awamutu, Leamington and Kihikihi on 08/09/2022 - 09/09/2022 where I was able to review the existing environment from locations on the public road network and public reserves.

Code of Conduct

2.7 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 2023. 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.

Scope of Evidence

2.8 My evidence will address the primary and further submission points of Kāinga Ora insofar as they relate to urban design matters, including the following:

- (a) Planning Framework and Policy Guidance relevant to urban design considerations;
- (b) Application of the Medium Density Residential Zone and amendments to the medium density residential standards;
- (c) Character, including Clusters, Streets and Design Guidelines;
- (d) Application of a High Density Residential Zone in Cambridge;
- (e) Vacant lot subdivision; and
- (f) Provision for increased building heights in the Commercial Zone of Cambridge and Te Awamutu.

2.9 Where appropriate and relevant, my evidence will reference and rely on the evidence of Mr Phil Osborne (economics), Mr Michael Campbell (planning) and Mr Gurvinderpal Singh (corporate).

3. PLANNING FRAMEWORK AND POLICY GUIDANCE

3.1 As PC26 is an Intensification Planning Instrument, the following section addresses the planning framework with particular reference to the statutory context created by the National Policy Statement: Urban Development 2020 ("NPSUD") and the directive requirements under the Resource Management Act 1991 ("RMA") as amended by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 ("HSAA").

National Policy Statement on Urban Development 2020 ("NPS-UD")

3.2 The NPS-UD provides national direction under the RMA and intends to improve the responsiveness and competitiveness of land and development markets. It requires local authorities to open-up more development capacity, so more homes can be built in response to demand. Objectives of the NPS-UD which are particularly relevant to PC26 from an urban design perspective include emphasis added):

Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety, now and into the future.

Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- (a) *The area is in or near a centre zone or other area with many employment opportunities;*
- (b) *The area is well-serviced by existing or planned public transport; and,*
- (c) *There is high demand for housing or for business land in the area, relative to other areas within the urban environment.*

Objective 8: New Zealand's urban environments:

- (a) *Support reductions in greenhouse gas emissions.*

3.3 Policies associated with the NPS-UD which are particularly relevant to PC26 from an urban design perspective include (emphasis added):

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (a) *Have or enable a variety of homes that:*
 - (i) *Meet the needs, in terms of type, price, and location, of different households ...*
- (c) *Have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*

- (e) *Support reductions in greenhouse gas emissions.*

Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:

- (d) *Within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.*

WAIKATO REGIONAL POLICY STATEMENT

- 3.4 The Waikato Regional Policy Statement ('RPS') provides direction as to the location of more intensive residential zonings. Relevant objectives and policies include (emphasis added):

Objective 3.12 Built Environment.

Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes.

Policy 6.5 Energy demand management.

Development should minimise transport, energy demand and waste production, encourage beneficial re-use of waste materials, and promote the efficient use of energy.

Policy 6.1 Planned and co-ordinated subdivision, use and development.

Subdivision, use and development of the built environment, including transport, occurs in a planned and co-ordinated manner which:

- (a) *Has regard to the principles in section 6A.*

Comment: Section 6A of the RPS as referenced in Policy 6.1 includes a set of principles to guide future development of the built environment within the Waikato region. These principles are not absolutes and it is recognised that some developments will be able to support certain principles more than others. Of particular relevance to the consideration of the spatial extent of residential zonings includes (emphasis added):

- (a) Support existing urban areas in preference to creating new ones;
- (c) Make use of opportunities for urban intensification and redevelopment to minimise the need for urban development in greenfield areas;
- (i) Promote compact urban form, design and location to:
 - (i) Minimise energy and carbon use;
 - (ii) Minimise the need for private motor vehicle use;
 - (iii) Maximise opportunities to support and take advantage of public transport in particular by encouraging employment activities in locations that are or can in the future be served efficiently by public transport;
 - (iv) Encourage walking, cycling and multi-modal transport connections; and
 - (v) Maximise opportunities for people to live, work and play within their local area;

4. WAIPĀ CONTEXT

4.1 The Waipā District is a Tier 1 territorial authority in the Waikato region of New Zealand. It is located south of two other Tier 1

territorial authorities, Hamilton City and the Waikato District. The Waipā District contains a number of towns, villages and rural communities. Those of which specifically relate to this evidence in chief include Cambridge, Te Awamutu and Kihikihi.

Cambridge

- 4.2 Cambridge is the largest town in the Waipā District with an estimated population of approximately 21,600 residents (June 2022). The existing urban character of Cambridge is strongly influenced by its relatively flat topography, urban grid structure, wide road corridors, mature vegetation, open spaces and relatively low density of development. In terms of its urban form, it is similar to most New Zealand towns and exhibits a range of architectural styles that reflect periods of urban development from the late 19th century through to today.
- 4.3 Cambridge is located towards the north of Waipā District and is located approximately 22km/ 25-minutes southeast of Hamilton City Centre via the State Highway 1 ('SH1') Expressway and straddles the banks of the Waikato River.
- 4.4 As at the 2018 census, the Central Cambridge Statistical Area Unit (which incorporates the existing Commercial Zone) was the largest for employment opportunities within the District with a total of 2,370 full or part-time roles. This was equivalent to 25% of Cambridge's entire 2018 workforce. The Hautapu Statistical Area Unit which includes the emerging Hautapu industrial area, Cambridge Raceway, Jockey Club, Velodrome and St Peter's School is the next major employment area with a total of 720 full or part-time roles. Equivalent to 7% of Cambridge's entire 2018 workforce. For context, as at the 2018 census 1,284 commuted from Cambridge to Hamilton for employment.

Te Awamutu

- 4.5 Te Awamutu has an estimated population of approximately 13,550 as of June 2022 making it the second largest town in the Waipā District. It sits at a key nodal point linking neighbouring rural communities from

the north, south, east and west. The existing urban character of Te Awamutu is characterised by a less formal grid structure than Cambridge and is more influenced by its rolling topography. A curvilinear street pattern dominates much of the existing urban area and is reflective of the majority of its urban development coming in the post-war period.

- 4.6 Te Awamutu is located in the south-west of the Waipā District and is approximately 28km/ 30-minutes south of Hamilton City Centre via State Highway 3 ('SH3').
- 4.7 As at the 2018 census, the Te Awamutu Central Statistical Area Unit (which incorporates the existing Commercial Zone) was the second largest for employment opportunities within the District with a total of 1,572 full or part-time roles.

Kihikihi

- 4.8 Kihikihi is located south of Te Awamutu. It lies approximately 5km/5-minutes south of central Te Awamutu and approximately 33km south of Hamilton City Centre on SH3. Kihikihi has a population of approximately 2,800 as of 2018 and is served by a small commercial centre. However, the town now appears to function more as a satellite suburb of Te Awamutu with only the Te Awamutu Golf Club separating each urban area. Like Cambridge and Te Awamutu, a range of low-density architectural styles representing various eras of development are visible across the town.

5. MEDIUM DENSITY RESIDENTIAL ZONE

- 5.1 As part of the submission process, Kāinga Ora were supportive of the areas identified for rezoning to the Medium Density Residential Zone. The exception to this was amendments sought in so far as the application of a High Density Residential Zone ("HDRZ") in close proximity to both the Cambridge and Te Awamutu town centres. This part of the submission is discussed further in Section 7 of this evidence.

- 5.2 The intention of the Medium Density Residential zone is to enable a range of low-rise apartment, terrace housing and multi-unit developments as envisioned by the strategic objectives and policies of the Planned Development District (“PDD”), the development principles contained within Chapter 6A of the Waikato RPS, and the Medium Density Residential Standards (“MDRS”).

Medium Density Residential Standards

- 5.3 The MDRS have been purposefully designed to enable typologies commonly understood across New Zealand as “Medium Density” development and are consistent with the zone description for the Medium Density Residential zone as set out in the National Planning Standards. As Waipā is a Tier 1 local authority, the MDRS standards must be applied within relevant residential zones.
- 5.4 The MDRS include seven core standards to enable development. These standards are intended to enable landowners to build up to three houses of up to three storeys on their sites as of right on most sites with greater density enabled as a restricted discretionary activity.
- 5.5 The MDRS represents a different approach to zoning/ controls to that which has been typically undertaken across many towns and cities in New Zealand. In my experience the more traditional approach to “enabling” more intensive typologies such as walk-up apartments have been to develop controls designed primarily to protect existing perceived amenity values of detached, low-density residential typologies and require more intensive typologies to fit within these. In my view, this often results in unnecessarily complex building forms, reduces opportunities to deliver intensification and makes it difficult for more intensive building forms to respond positively to the street. From an urban design perspective, there are also benefits to adopting a consistent approach to the development standards covering medium density development due to the increased use of modular or standardised terraced and apartment typologies.

- 5.6 As part of the Plan Change process, WDC has sought to introduce a number of bespoke amendments to the MDRS covering building setbacks, and roof pitch. Additional amendments have also been sought with respect to qualifying matters addressing “character”, “river/gully proximity”, “stormwater” and “infrastructure”. As was stated through the submission process, Kāinga Ora generally opposed these amendments. Where these are relevant to urban design, I address them further below.

Setbacks

- 5.7 As part of the submission process, Kāinga Ora opposed the proposed boundary setback rules identified as qualifying matters. Rule 2A.4.2.6 (a) - (e) introduces a number of bespoke building setbacks. Kāinga Ora considered that such setbacks had not been sufficiently justified under S77J-L of the HSAA due to the limitations they would otherwise place on MDRS-enabled development.
- 5.8 I am generally supportive of the Kāinga Ora position from an urban design perspective and make specific commentary on each point below:

Point (a) - Along boundaries adjoining a state highway, a setback of 7.5 metres is required for dwellings and sleep outs.

- 5.9 Paragraph 9.14.21 of the s42A report, states that the rule as proposed requires refinement to target the setback to particular noise sensitive activities including dwellings and sleep outs. The primary intent of this rule is therefore related to internal amenity.
- 5.10 In my opinion, from an urban design perspective, the 7.5m setback is overly restrictive for buildings and has the potential to give rise to adverse design, streetscape, safety and amenity outcomes. From a design perspective there are a range of measures that can be incorporated into a development or the streetscape that can address aural amenity including insulation, double/ triple glazing, noise walls, configuration of internal dwelling layouts, and road surface

treatments. Several issues are likely to arise with Council's approach, such as:

- (a) It encourages the placement of outdoor living spaces, and for development to "turn its back" to the street edge to gain development efficiencies across the various standards (i.e setback, outdoor living space, outlook). This gives rise to potential amenity, privacy and streetscape issues where there is a general expectation amongst residents of a degree of on-site amenity in outdoor living areas. This can result in lower levels of passive surveillance of the street through increased fence heights, reduced legibility of urban environments through the removal of traditional front doors or reduced privacy for future residents within outdoor living spaces.
- (b) Alternatively, a more intensive development could look to utilise this setback as an area of on-site car parking and vehicle manoeuvring area, reducing the quality and attractiveness of the streetscape as well as passive surveillance opportunities.
- (c) State highways through smaller towns such as Te Awamutu still function as typical urban streets with the main difference related to Heavy Good Vehicle movements. They are increasingly becoming slower speed environments as they also need to accommodate a range of pedestrian and cycling movements. Setting buildings back from the State Highway reduces the potential for street enclosure. High ratios of street enclosure can have a traffic calming effect and can help a street appear narrower than it actually is, promoting slower speeds and increasing driver attention.
- (d) The above outcomes would either significantly detract from the level of ground floor passive surveillance achieved over the public realm or detract from the visual quality and amenity of the streetscape.

- (e) An increased setback at the front would reduce design flexibility across the site and could result in buildings being unnecessarily pushed closer together reducing a sense of openness that could still be maintained by a feasible development built in line with the MDRS.

5.11 Accordingly, I recommend that this setback is deleted.

Point (b): On sites adjoining a road where the Character Street policy overlay area applies, a front yard setback of 6 metres is required.

5.12 Please refer to paragraphs 6.14 - 6.20 of this evidence where I have assessed this point in detail and recommended its deletion.

Point (c): On sites adjoining a reserve, a setback of 4 metres is required along the boundary adjoining the reserve.

5.13 Paragraph 9.16.21 of the s42A report states that:

"an increased setback will not negatively impact passive surveillance if developments include building design that orientates glazing, living spaces and outdoor living areas towards adjoining reserves and includes compliant landscaping and boundary fencing. The increased setback will also ensure the adjoining reserves provide maximum benefit to the public through reducing visual dominance and the risk of reverse sensitivities restricting the use of these for sport and recreation."

5.14 In my view, the proposed setback is overly onerous for future development and will reduce flexibility of design outcomes to suit specific site characteristics. There are a range of common situations where this may adversely impact on site layout and not provide the anticipated benefits. This includes situations where reserves are located south of adjacent sites and there may be a desire to place outdoor living space to capture a northern orientation; or where sites have more than one boundary adjoining a reserve, resulting in a

greater proportion of developable area lost; or where there are material topographical changes between useable reserve areas and neighbouring sites.

- 5.15 I agree that developers may look to provide the required outdoor living spaces for future residents along this interface to aid with site efficiency and potentially provide a positive interface with a reserve. Alternatively, this area could also be used for vehicle manoeuvring which is a common outcome due to the predominant linear cadastral pattern of residential lots across New Zealand.
- 5.16 From an urban design perspective, I also consider that it can also be a positive design outcome to have buildings closer to a reserve edge to promote a greater degree of passive surveillance and visual connection between the private and public realms.
- 5.17 Further, I do not consider that a permitted building constructed to the MDRS¹ would give rise to adverse “visual dominance” effects that need to be reduced via an increased building setback. It is important to note that the Height-in-relation-to-boundary standard already manages issues of potential “visual dominance” at upper floors. The 4m+60⁰ control effectively results in a setback of a third storey by 4m from the boundary (at 11m in height). Assuming a 3.5m ground floor, a typical second storey would be required to be setback around 1.73m from the side boundary. As such, a 4m building setback would primarily impact development at ground-floor level where visual dominance effects would be *de minimis*. In light of the above, it is questionable as to whether the proposed 4m setback would result in any perceivable differences in visual mass associated with a permitted three storey building above and beyond the side and/or rear yard dimensions of the MDRS that Kāinga Ora seek. In addition, the perceived mass of a building is highly dependent on a range of factors such as distance from the building, permanent vs transient views,

¹ Outside of the MDRS, I understand that build costs are likely to play a significant factor in what is actually realisable on any given site for permitted development. The development economics/feasibility of a detached three-storey dwelling which maximises building coverage on a typical site is unlikely to be competitive in price with either new greenfield development or the existing housing stock across Waipā's urban areas.

quality of building articulation, the presence and scale of landscaping and topography.

5.18 Accordingly, I recommend that this setback is deleted.

Point (d): On sites adjoining the Te Awa Cycleway, a setback of 5 metres is required along the boundary of the site adjoining the cycleway.

5.19 With reference to paragraphs 9.14.36. - 9.14.38 within the s42A report, it is noted that the rationale for setbacks covering Te Awa Cycleway have been captured more broadly as part of a discussion on setbacks from lakes and water bodies. As such, there appears to be no actual justification for their inclusion other than the fact they are part of the current, pre- NPS-UD/ MDRS District Plan.

5.20 I have not been able to locate the Te Awa Cycleway on any District Plan Maps. Mapping I have sourced indicates that the Te Awa Cycleway passes through Cambridge and Leamington via on-street cycleways. By definition this would require a 5m setback for development fronting parts of Alpha Street, Victoria Street, Cook Street, Shakespeare Street, Wordsworth Street and Carlyle Street. Noting that these are on-street cycle ways on largely straight roads it is not clear why further building setbacks are required. Conversely, the Te Awa Cycleway as it passes through Cambridge would benefit from reduced setbacks to enable a greater degree of street enclosure and help promote reduced travelling speeds and increased driver attention.

5.21 Accordingly, I recommend that this setback is deleted.

Point (e): On sites adjoining arterial roads, a setback of 4 metres is required along the boundary adjoining the arterial road.

5.22 The District Plan includes a road hierarchy layer. There is no road identified as an "Arterial Road" although there are four classifications with an arterial function - Major and Minor (both existing and to be

constructed). It is not clear at first reading whether the intended setback applies to any or all of these road classifications.

5.23 Assuming that it applies to all of the potential arterial road classifications, as with other setbacks I have concerns from an urban design perspective.

5.24 Paragraph 9.17.47 of the s42A report states that:

“XYST have concluded that setbacks along roads are in part necessary to protect existing street trees and to enable new large specimen street trees to grow to maturity. This is essential to creating a public sphere that contributes to a well-functioning urban environment envisaged in NPS-UD. They go on to note that the setback supports the ability for the existing 6,000 street trees and new street trees to grow to maturity and not be negatively impacted by adjoining residential development. As confirmed with Council’s arborist, any reduction in the 4m setback to arterial roads would likely have a significantly detrimental effect on the street tree network.”

5.25 I have undertaken a desktop review in Google Streetview of a range of the arterial road corridors to which this control would apply, in addition to driving many of these streets during site visits. This process indicates vastly different streetscape environments which is not entirely consistent with the rationale of this control. I note that there are significant portions of arterial road corridors with no street trees, street trees down the centre of the road, trees on the carriageway side berm and trees on the property frontage berm. There are also situations where overhead transmission infrastructure is observed for which the absence of mature tree cover is generally sought (see Figure 1 for example).



Figure 1: Shakespeare Streetscape Condition. Image location: Looking northeast from outside 44 Shakespeare Street, Cambridge.

- 5.26 I note that one of the concerns is also about undermining the potential for future, as yet unplanted trees. I do not support placing design controls on a site for an event where there is no certainty as to whether it would even occur, particularly given the anticipated outcome in this case relates to actions that may or may not take place within the (public) road corridor and are matters which do not otherwise appear to be outcomes anticipated by the District Plan (i.e. the planting of additional trees within the road corridor).
- 5.27 I also note that many of the arterial roads within urban areas of the District extend to 30m in width, much wider than a typical road in New Zealand (20.1m). As such, in many instances there is sufficient space available within the road corridor for street planting that would be unaffected by adjacent buildings.
- 5.28 In my opinion, the proposed 4m setback could result in adverse urban design effects as I have previously stated in Paragraph 5.10(a)-(e) and should be deleted.

Roof Pitch

- 5.29 As part of the submission process, Kāinga Ora opposed the proposed standard which required “a residential dwelling of 2 or more stories shall have a minimum roof pitch of: 30 degrees in any character cluster area” or “15 degrees in all other parts of the zone”.
- 5.30 With reference to paragraph 9.11.14 within the s42A report, it states:

"The roof pitch provisions in character areas are still supported as a specific characteristic of these areas. More broadly, based on discussions with Council planners, it is considered that roof pitch provisions should also remain across the remainder of the zone as these form part of the district's broader urban character".

- 5.31 In my opinion, the proposed standard is overly prescriptive and has the potential to unnecessarily undermine the delivery of a variety of housing typologies (in terms of type and price) as required by the NPS-UD. There is also a high degree of ambiguity as to how the rule should be applied noting that a single building can have more than one roof or incorporate a variety of roof pitches.
- 5.32 Figures 2 - 5 below provide examples of typical medium density developments which would infringe the proposed rule:



Figure 2 - Christchurch Row Housing

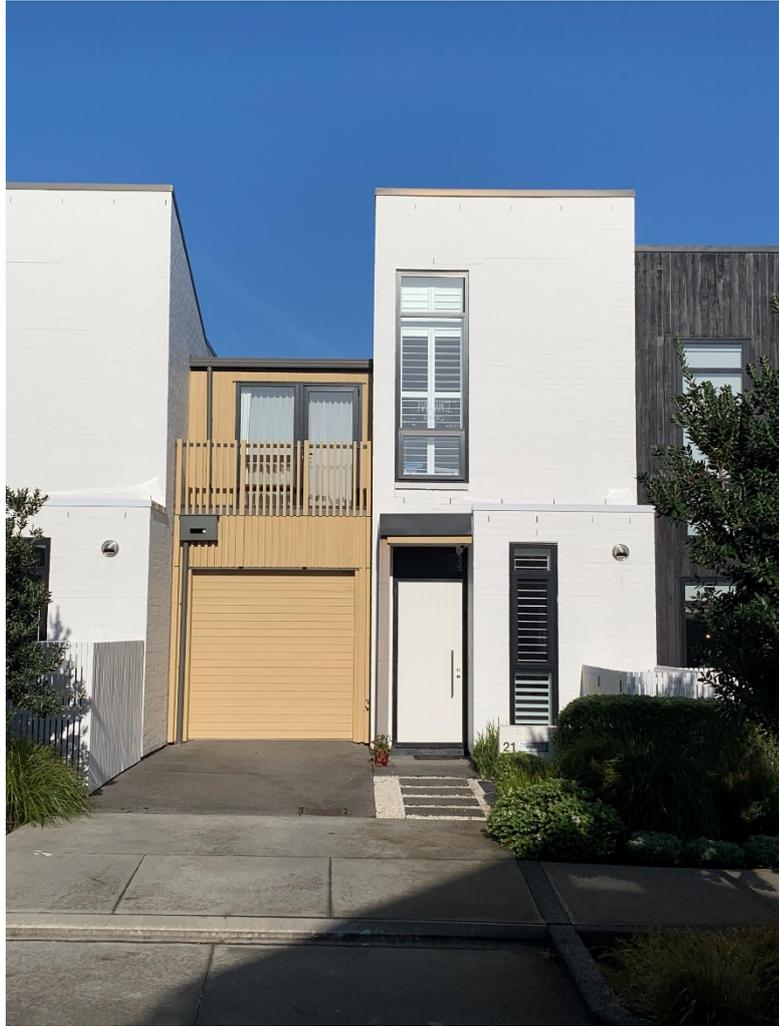


Figure 3 - Hobsonville Row Housing



Figure 4 - Hobsonville Duplex Housing



Figure 5 - Hobsonville Walk-up Apartment

- 5.33 In my opinion, these all provide appropriate design outcomes and help add to overall visual interest and diversity of housing stock in both type and appearance.
- 5.34 I also note that there are several existing dwellings within the identified 'Hall St / Hamilton Rd Character Cluster' which incorporate flat roof forms (refer to figure 6), or roof forms with a near indiscernible pitch as viewed from the streetscape (refer to figure 7). I acknowledge these dwellings are single level only, however, their flat roof forms do contribute to the existing character of the area. In my view, it would be unjustified to restrict the ability to construct specific roof form outcomes which are already present within the existing built environment, and which have already been identified as a 'Character Defining Property' in the case of 43 Hall Street, Cambridge.



Figure 6: 41A Hall Street, Cambridge - Non-Character Defining Property within the Hall St / Hamilton Rd Character Cluster



Figure 7: 43 Hall Street, Cambridge - Character Defining Property within the Hall St / Hamilton Rd Character Cluster.

Assessment Criteria

- 5.35 As part of the submission process, Kāinga Ora sought amendments or deletion to assessment criteria under Chapter 21 of the District Plan and applying to new development within the MDRZ. These have been further refined and are now attached to Mr Campbell's evidence.
- 5.36 I support the proposed amendments of Kāinga Ora from an urban design perspective. In my opinion, they are well aligned with the

design outcomes enabled by the MDRS and provide a suitable level of detail that can help inform the design and development process and are consistent with good urban design practice.

6. CHARACTER

Character Clusters

- 6.1 As part of the submission process, Kāinga Ora sought to delete the character cluster statements and overlays in their entirety within PC26.
- 6.2 I note that character controls are a common method adopted in various District Plan's across the country that seek to blend considerations across heritage, landscape architecture and urban design. In the context of Waipā, I understand that it is primarily an instrument reflecting s7(c) of the RMA rather than s6(f) of the RMA. In considering the appropriateness of the resulting design outcomes associated with these controls, consideration of Policy 6 of the NPS-UD is also relevant. In this regard, it is important that our urban areas are able to evolve to face emerging challenges and new ways of living.
- 6.3 Subsequent to the submission, WDC undertook further investigation and analysis of the Character Clusters. This analysis, undertaken by Ms Carolyn Hill (Lifescapes), has resulted in refinements, reductions and increases in Character Clusters and has subsequently informed some of the amendments outlined within the s42A report.
- 6.4 I am supportive of the proposed amendments which have removed isolated, individual buildings from Character Clusters across Cambridge, Te Awamutu and Kihikihi. However, I do not support the inclusion of the remaining Character Clusters based on their associated rule and assessment framework. Specific issues include:
- (a) The Character Clusters identified also include a number of "non-character defining properties". Despite having been identified as containing no character defining properties, the same rules and assessment requirements are applied as to

those with identified character defining properties. I note Ms Hall recommended that these be differentiated within the District Plan. This recommendation does not appear to have been adopted. Ms Hall subsequently considers that these differences are able to be considered using the assessment criteria under 21.1.2A.4.² Based on my reading of the wording of the character statements within DG1 I don't believe there is any meaningful ability to differentiate the design outcomes and any subsequent assessment between character defining and non-character defining properties.³ This is reinforced by the application of the same controls and activity status applicable across these two categories of properties. In my opinion, the additional controls associated with non-character defining' buildings, are overly onerous on potential future development and unnecessarily restrict the potential for the delivery of intensification in a manner which responds to, and enhances surrounding character values.

- (b) A significant contributor to the character values of each Cluster appears to be related to the street environment (e.g. mature street trees, regular and straight vistas / view corridors, berm and footpath layouts) or the wider urban fabric (e.g. block structure, natural landform). These are set out under the "streetscape forms" section of each Character Cluster statement within DG1. Such features are entirely within the control of WDC and would not be subject to changes through resource consent applications for redevelopment of private property.
- (c) A number of character defining properties (and associated architectural values excluding their low height) are obscured from view from the surrounding environment through a combination of mature trees and/or high street fencing/hedging (refer to Figures 8 and 9 as an example).

² Paragraph 11.2 of Ms Hall's Evidence-in-Chief, dated 24/03/2023

³



Figure 8 - Character defining property at 47 Grey Street (source: Google streetview)



Figure 9 - Character defining property at 157 Victoria Street (source: Google streetview)

- (d) The wording and intent of the character statements within DG1, are such that any intensification or redevelopment of more than a single-storey, detached dwelling would, in my opinion, find it difficult to gain resource consent no matter how sympathetically designed. Based on my reading of these, intensification in these areas would likely be deemed

incongruous and inappropriate and be very difficult to achieve, even on sites identified as “non-character defining”.

- (e) There appears to have been no consideration of including Character Clusters within the District Plan alongside a provision for greater intensification subject to design review via a resource consent process. In my opinion, this represents the most effective design option as it helps to recognise and maintain some character values while supporting the benefits of more intensive housing in the District’s urban areas (and the national significance of urban development). Matters of discretion and assessment criteria can be an effective design method to help guide appropriate forms of development whilst providing an option to refuse inappropriate development. In my opinion, providing a realistic consenting pathway for higher density development within character clusters has the ability to produce outcomes such as those shown in Figures 9 and 10 below. These examples acknowledge and respond to architectural values and forms of early 20th century housing (which is one of the defining values of each character cluster) whilst still supporting intensification and a more efficient use of scarce urban land in proximity to a town centre. These can be contrasted with Figure 11 which shows a modern brick and tile type development within the Victoria Street Character Cluster which would be difficult to redevelop for more than a single dwelling under the proposed rule framework. It is not clear to me why this is considered a more desirable built form outcome that warrants protection through the policy and rule framework of the District Plan.



*Figure 9 - Three-storey character terraced housing, Christchurch
(Source: Brookfields)*



*Figure 10 - Two-storey character town houses, Christchurch
(Source: Brookfields)*



Figure 11 - Dr Tod Court Pensioner Housing, Victoria Street Character Cluster

- 6.5 In addition to provision of a resource consent pathway/ design review process, I also consider there would be merit in amending the front yard building setback standard within Character Clusters on both character defining and non-character defining sites. This would include a front-yard building setback of 3m, with an additional requirement for that all front yards (excluding vehicular and pedestrian access points) must be planted with a mixture of trees, shrubs or ground cover plants. This provides response to some of the identified features which contribute to the character of these areas from the public realm by requiring a landscaped frontage for new development.

DESIGN GUIDELINES

- 6.6 Kāinga Ora's submission sought deletion of all references to Design Guidelines across the plan, with the provisions instead being updated to reflect design outcomes sought, external design guides are references as a guidance note only, or that guidance is streamlined and simplified.
- 6.7 With reference to paragraph 9.28.10 within the s42A report, it is noted that:

"the submission requesting that all reference to design guidelines be removed from the District Plan is requesting a fundamental change to the way design guidelines are contained and referenced in the Plan that appears to go beyond what PC26 has proposed in relation to design guidelines which is limited to the addition of the MDRZ and amendments to DG1. For this reason, this request is not recommended to be supported."

- 6.8 Within the context of PC26, provisions refer to either "the extent to which Design Guidelines (Appendix DG1) have been applied" in relation to development within Character Clusters or "alignment with any relevant Urban Design Guidelines approved by Council" in relation to the development of four or more dwellings within the MDRZ. PC26 also proposes to amend DG1.

DG1

- 6.9 With regards to the proposed amendments to DG1, my first observation is that they could not be considered "guidelines". They provide no guidelines to inform the design process, rather they set out a series of factual statements that relate to each character cluster. An example of the difference between a guideline and the DG1 text is provided below.

Typical Guideline Example	DG1 Text
Have a look at the surrounding houses and try to use sympathetic or complementary colours and materials.	Houses in the villa style (late 19 th - early 20 th century), typified by gabled bays, verandas, weatherboard cladding, timber sash windows, substantial brick chimneys and generous ornamentation.

In light of the above, it is not clear how one would understand the extent to which DG1 has been applied⁴ as part of any assessment for subdivision in the MDRZ. Accordingly, I would recommend that 21.1.15.6(U) is deleted.

⁴ 21.1.15.6(u)

- 6.10 There are various other references in matters of discretion for development in the MDRZ to “effects on existing character identified in ... DG1”. In my opinion, the proposed changes to DG1 are worded⁵ such that any form of intensification or redevelopment of more than a single dwelling would not align with the character statements. Therefore, intensification in these areas would be very difficult, even on sites identified as “non-character defining” and with proposals that were sympathetic and responded to identified character. In my opinion, character values identified for specific sites should inform new development within these areas rather than restrict it. This can include references to materiality, articulated building facades, roof forms, building forms and building proportions rather than an absolute limit on height and density of development.
- 6.11 In line with my recommendations (and those of Ms Hill) to differentiate between character contributing and non-character contributing properties, Mr Campbell⁶ has identified a number of amendments to rules, matters of discretion, assessment criteria and DG1. I am supportive of these amendments from an urban design perspective.

Other Design Guidelines

- 6.12 PC26 also includes references to “alignment with any relevant Urban Design Guidelines adopted by Council” that apply to the assessment of 4 or more dwellings in the MDRZ⁷. I have considerable concern as to what these guidelines could contain and whether they could be used, in future, to undermine delivery of development in line the MDRS. It is not clear what process would be available to review or contribute to the development of such guidelines or whether they would be incorporated into the District Plan via a Schedule 1 process.
- 6.13 This has the potential to result in an overly onerous exercise for the development, particularly as each site has specific and sometimes unique conditions which can often require a more bespoke response

⁵ “low density layout”, “stand-alone and general single storey”

⁶ Appendix A, Evidence in chief, dated 06/04/23

⁷ 2A.4.1.3(b)

which may not fit within more universal or generic 'guidance' provided. In this regard, implying "alignment" as a matter of discretion with as yet unknown design guidelines is considered inappropriate from my perspective and adds a high degree of uncertainty into future design and consenting processes.

- 6.14 In my opinion, reference to any future design guidelines is unnecessary and should be removed. A more appropriate alternative would be to use assessment criteria to inform the scope of any future design guide.

CHARACTER STREETS

- 6.15 The Kāinga Ora submission opposed the existing and proposed spatial identification of 'Character Streets' and associated 6m setback.
- 6.16 Since PC26 was notified, the spatial identification of the 'character streets' has been refined through further analysis undertaken by Ms Hill. Ms Hill's analysis and reporting has helped to guide and inform the position outlined within the s42A report. Paragraphs 9.17.37 within the s42A report states:

"Lifescapes have assessed that a 6m setback is appropriate to maintain the particular character qualities of identified character streets, however, they note that their fieldwork has resulted in a recommended reduction of character street coverage across Cambridge".

- 6.17 As part of the s42A report, a number of 'Character Streets' were removed from PC26, including:
- (a) Princes Street, Cambridge;
 - (b) Thornton Road, Cambridge;
 - (c) Bryce Street, Cambridge;
 - (d) Moore Street, Leamington;

(e) Burns Street, Leamington; and,

(f) Turere Lane, Te Awamutu.

6.18 I support the removal of these 'Character Streets'.

6.19 Three character streets are proposed to be retained - Hall Street and Hamilton Road in Cambridge, and College Street in Te Awamutu. With reference to Appendix D - Heritage Character Report 2023 (Lifescapes) (pages 16 - 17), Ms Hill states that the remaining 'character streets' "display historically-derived physical and visual characteristics that collectively illustrate part of the town's story and identity, including long vistas that relate to the early town plan grid layout, mature tree avenues, and a regular rhythm of housing setbacks allowing for landscaped gardens in front yards." She considers that development enabled up to 1.5m from the front boundary would adversely impact on these qualities. With regard to these qualities, I note:

(a) **Long vistas that relate to the early town plan grid layout:**

In my view, any potential future built form outcomes which could be otherwise enabled under the MDRS will not result in any change to the physical and visual characteristics associated with these vistas. The vistas will be retained in perpetuity as these are heavily defined by the street alignments themselves notwithstanding the presence of development in accordance with MDRS outside of the street corridor. I also note in many instances existing mature vegetation and topography changes already obscure many of the vistas, as does the distinct dog leg of College Street.

(b) **Mature tree avenues:** the existing mature trees located within the road reserve which contribute to the character of the identified streets remain within the ownership and management of Council. Their removal (ore retention) is at the entire discretion of Council.

(c) A regular rhythm of housing setbacks allowing for landscaped gardens in front yards, whilst the 1.5m setback enabled under the MDRS would alter the 'regular rhythm', there are no specific provisions proposed that require this space to be planted with soft landscaping. In my experience working on behalf of both Council and private developers, it would not be uncommon to see private developers use this 6m setback for alternative design outcomes which could be counter to part of the intent of the proposed rule. For example, including vehicle parking and maneuvering areas⁸ and / or future private outdoor living spaces (with an associated desire for increased privacy from the street) within the setback. In my opinion, such outcomes could detract from the safety, visual quality, and amenity of the streetscape.

6.20 In addition, I note that both Hall Street and Hamilton Road are already unusually wide roads at 30m compared to the traditional 20.1m roads across most of the District (and New Zealand). This would help to ensure these streets feel distinctive from others across Cambridge and retain a spacious and open streetscape environment.

6.21 In my opinion, enabling development up to the 1.5m front yard setback does not give rise to adverse effects on these streets or will detract from the "visual dominance of tree avenues". Figure 11 provides an example of this where buildings up to five stories high exist in close proximity to the street boundary. The overall scale of mature vegetation along this street ensures that these remain the most visually dominant feature of this street.

⁸ The 6m setback could comfortably afford two perpendicular car parking spaces adjoining a driveway / accessway with a maximum required width of 2.7m as per the Waipā District Plan.



Figure 12 – Highbury New Park, London – a tree lined avenue adjacent to medium density development.

- 6.22 Further, from an urban design perspective, any potential future built form which is developed under the MDRS provisions could help to frame the long vistas identified and create a greater degree of street enclosure which has been demonstrated to assist with providing a greater sense of comfort and safety for pedestrians within the streetscape⁹. Further, the mature vegetation, primarily in the case of Hall Street and Hamilton Roads provides a high level of natural amenity which makes it more suitable to support a higher density of development.
- 6.23 In my opinion, the 1.5m setback afforded by the standard MDRZ provides greater flexibility for onsite design solutions that could address and respond more positively to these “character streets” which are primarily defined by elements under public control. In this regard, there may be some benefit in formalising a landscaped interface within the front yard with a requirement for that all front yards (excluding vehicular and pedestrian access points) along Character Streets must be planted with a mixture of trees, shrubs or ground cover plants.

⁹<https://www.movementandplace.nsw.gov.au/place-and-network/built-environment-indicators/street-enclosure>.

7. HIGH DENSITY RESIDENTIAL ZONE

7.1 The submission of Kāinga Ora sought the introduction of a High Density Residential Zone (“HDRZ”) to be applied within an approximate 800m walkable catchment of the Cambridge Town Centre and 400m of Te Awamutu Town Centre. As part of their submission, Kāinga Ora provided a suite of provisions associated with the HDRZ.

7.2 Paragraph 9.4.9 of the s42A report states that:

“A High-Density Residential Zone (‘HDRZ’) requested by Kāinga Ora (Submitter 79) adjacent to the town centres of Cambridge and Te Awamutu is not appropriate on the basis it represents a building height which would not be commensurate with the level of commercial activity and community services that exist in these centres. Mr McGahan also considers “that the demand for this typology is currently very limited within the district as a smaller urban economy” and that “the proposed provisions are likely to be too extensive relative to the market size.”

7.3 Subsequent to lodgement of Kāinga Ora’s primary submission, further spatial and economic analysis was undertaken to determine the appropriateness of the requested spatial extent of the HDRZ. This has resulted in a revised position where Kāinga Ora no longer seeks application of the HDRZ within Te Awamutu and where the extent of the HDRZ sought within Cambridge has been reduced to an approximate 400m walking catchment from the town centre¹⁰ (refer to Attachment A). I support this revised position.

7.4 At a macro level, the discipline of urban design considers the optimal spatial arrangement of land uses and densities relative to each other that:

- (a) results in the most efficient use of land;

¹⁰ As the Commercial Zone encompasses an area much greater than what would be considered a town centre for the purposes of the NPS-UD, the boundaries of the town centre were derived from the “Town Centre Zone” set out in Figure 18 of the Cambridge Town Concept Plan 2010.

- (b) supports the vitality of community and commercial centres;
and
- (c) maximises use of sustainable modes of transport;

while responding to the unique and specific characteristics of an area. It is within this context with which I consider the potential introduction of the HDRZ into Cambridge.

- 7.5 In terms of the revised spatial arrangements of the HDRZ, it's worth noting that the zone boundary have been aligned with natural boundaries such as streets and open spaces resulting in the extent extending beyond and falling short of a 400m/ 5-minute walking catchment in some places. This has the benefit of providing natural transitions/ buffer spaces between the more intensive HDRZ and low-scale MDRZ. This will help to ensure that the most intensive forms of development are encouraged in areas where they can best support Cambridge town centre, helping to support a reduction in greenhouse gas emissions and concentrating it into an area where it can be more efficiently serviced by infrastructure.
- 7.6 I disagree with the s42A report that considers in paragraph 9.4.9 that the proposed building heights of the HDRZ would not be "*commensurate with the level of commercial activity and community services that exist in [Cambridge].*" Within the wider sub-region, Cambridge town centre performs well in the range of commercial opportunities and community services available with only Hamilton City Centre, Frankton and Te Rapa above it within the existing centres hierarchy. In my opinion, its existing size and overall offering is comparable to some of Auckland's metropolitan centres including Papakura and Takapuna and generally in excess of typical town centres across the Waikato and parts of Auckland. I believe this is in part reflected in its classification as a proposed metropolitan centre within the Hamilton-Waikato Metro Spatial Plan (Future Proof).
- 7.7 There are a number of particular features which currently exist in or immediately adjacent to Cambridge Town Centre and the proposed

HDRZ that make its application consistent with not only Policy 3(d) but also Policy 1 of the NPS-UD. These include:

- (a) Two full-service supermarkets;
- (b) Cambridge Primary, Cambridge Middle, St Peter's Catholic School and several childcare facilities;
- (c) Large format retail destinations (Briscoes and the Warehouse);
- (d) A wide range of small-scale retail, professional services, food & beverage, and entertainment opportunities (e.g. cinema);
- (e) Several civic and cultural amenities including the Town Hall, Council Offices, churches, and Cambridge Museum;
- (f) Several public open spaces serving a range of uses including the Perry Aquatic Centre, Victoria Square, Lake Te Koo Utu Reserve, and Waikato River esplanade reserves; and
- (g) A wide range of medical facilities including doctors, specialist facilities, pharmacies, dentists;
- (h) Approximately 2,370 full and part-time jobs (as at 2018); and
- (i) Regular buses that provide access to/ from Hamilton City Centre and Waikato University.

7.8 This wide range of services and amenities also has the benefit of suiting a wide range of demographics from young children through to retirees. From an accessibility perspective this makes it particularly well suited to more intensive residential typologies and is important in delivering a meaningful reduction in greenhouse gas emissions noting that trips outside of the typical working commute make up the significant majority of all trips made.¹¹

¹¹ NZ Household Travel Survey <https://www.transport.govt.nz/statistics-and-insights/household-travel/sheet/key-facts#element-188>

- 7.9 Further, forecasted increases in demand for business land/ floorspace (as discussed in paragraphs 15-19 of Mr Osborne's evidence) will continue to expand the commercial and community offering in the future. Mr Osborne notes, in paragraph 16, that this will be "driven by both the service requirements of a growing population as well as a likely increase in the ability for the centres to retain activity through increased self-sufficiency."
- 7.10 In addition to the above, Cambridge town centre also benefits from high levels of natural amenity derived from reserves and open spaces, and extensive mature vegetation within the street network. This provides opportunities for "borrowed amenity" from these spaces and features to supplement more intensive forms of housing.
- 7.11 There is also evidence of increasing acceptance and desire for higher densities housing typologies in Cambridge as well as the Waikato more broadly. Recent examples in Cambridge include the 'Lakewood' development and 'Leamington Apartments'. More intensive housing typologies have also historically been adopted in the retirement sector, for example the 'Apartments on Vogel' currently under construction. Despite the examples above, modelling undertaken by Mr Phil Osborne on behalf of Kāinga Ora indicates that there are limited opportunities for feasible intensification opportunities at the MDRS permitted height limits of 11m.¹² Both feasible and realisable development improves towards the 22m height sought by Kāinga Ora. This aligns with anecdotal evidence of conversations I have had with clients and other in the development community where the economics of development above three-storeys can be challenging and there is a need to recoup costs associated with the increased structural, fire and access requirements of buildings above three-storeys. On an average site this typically kicks in at around six-to-seven storeys.
- 7.12 The typologies available within the HDRZ also enables a greater degree of variety for more intensive residential dwellings around centres which can often be perceived as more desirable for residents

¹² Paragraph 23, Evidence in Chief, 06/04/2023

who want access to nearby amenities, but equally do not want the increased levels of noise (especially during night hours) or perceptions of reduced privacy that can often be associated with apartments located within a centre.

- 7.13 In terms of the proposed policy and rule framework for the HDRZ sought by Kāinga Ora, I am generally supportive of this from an urban design perspective as it would enable a greater variety of housing types and prices to suit a wider range of potential residents. Further, the proposed level of development sought via the HDRZ would provide a meaningful incentive to seek residential development opportunities immediately adjacent to Cambridge Town Centre rather than more broadly as enabled by the MDRS. It is noted by Ms Susan Fairgray¹³ (on behalf of Council) and Mr Osborne¹⁴ (on behalf of Kāinga Ora) that potential demand for more intensive typologies is still relatively constrained within Waipā. As such, there would be overall urban form and centre vitality benefits in trying to direct this growth to occur as close to Cambridge town centre as possible. I note Ms Fairgray reaches similar conclusion in paragraphs 10.6 and 11.3 of her evidence.
- 7.14 However, I do consider some amendments to the HDRZ could be warranted to help address the interface with scheduled heritage buildings and Character Clusters (should these be retained). In this regard, I would recommend the following:
- (a) Application of a Height-in-relation to boundary controls of 4m +60° for any HDRZ site boundary which directly adjoins any scheduled heritage or character defining property. This would assist in providing a transition in building scale with new development and may ultimately impact on the total permitted building height obtainable on such a site. In my experience, this is fairly common design method that acknowledges historical building forms whilst integrating with the new;

¹³ Paragraph 11.8, Evidence in Chief, 24/03/2023

¹⁴ Paragraph 41, Evidence in Chief, 06/04/2023

- (b) Consistent with my recommendations for the MDRZ, an increase in the front-yard building setback for HDRZ sites within identified Character Clusters to 3m, with an additional requirement for that all front yards (excluding vehicular and pedestrian access points) must be planted with a mixture of trees, shrubs or ground cover plants. I understand from consulting colleagues with a background in landscape architecture that a distance of 3m provides adequate space to support the growth of sufficiently sized specimen tree plantings that can contribute back to the streetscape and help new development integrate with the existing urban environment of Cambridge;
- (c) A reduction in building coverage to 50% in the HDRZ. This would assist in reducing overall building bulk and ensuring a greater degree of openness around more intensive building forms. This may also have the benefit of reducing pressure to remove existing mature vegetation to maximise development within the enabled building envelope. In my opinion, this is more consistent with some of the existing qualities associated with Cambridge's urban environment.
- (d) In addition to the above controls, the inclusion of an additional matter of discretion to manage the interface with scheduled heritage and Character Cluster features. This would enable a design review of more intensive developments adjacent to any scheduled heritage or character defining property to ensure development has regard to key heritage or character values (e.g. materiality, building forms, proportions).

7.15 Overall, in my opinion, there is a clear national and regional policy framework to promote and enable greater levels of residential intensification of existing urban areas with a particular focus on locating intensification in areas which would better support the use of active modes of transport, reduce private vehicle use and contribute to the more vibrant, well-functioning centres. This is

consistent with good urban design practice, which considers the optimal spatial arrangement of land uses relative to each other that results in the most efficient use of land, supports community and commercial centres, and maximises use of active and public transport networks. In my opinion, the application of the HDRZ in close proximity helps to achieve this, is consistent with good urban design practice and national policy direction.

8. VACANT LOT SUBDIVISION

- 8.1 The submission of Kāinga Ora sought various amendments to subdivision standards to 15.4.2.1 to 15.4.2.3 associated with the MDRZ (and their proposed HDRZ). This includes removal of minimum and average lots areas for vacant lot subdivision as well as minimum lot frontage widths.
- 8.2 I concur with Kāinga Ora's reasoning in their primary submission and support the adoption of an 8m x 15m shape factor as an appropriate alternative. In informing this shape factor, Kāinga Ora undertook a modelling exercise to demonstrate how this shape factor could accommodate a viable building that complied with the MDRS. I have reviewed this modelling and have concluded that it presents a realistic and appropriate model for how development could occur on an individual site with a shape factor of 8m x 15m assuming no other constraints exist on the site. This modelling is included as Attachment B to this evidence.
- 8.3 In my opinion, the shape factor proposed by Kāinga Ora is well considered in that constrains realistic/ feasible "3x3" development enabled by the MDRS. An 8m x 15m shape factor results in a site area of 120m² enabling building coverage of 60m². Application of height-in-relation-to-boundary controls would limit development to two-storeys, thus limiting overall building floor area to 120m². Assuming an even split amongst permitted dwellings this could, in theory enable three dwellings of 40m² each. Whilst this space is sufficient for a studio or 1-bedroom apartment, internal dwelling configurations and access arrangements and open space requirements would likely make

this difficult to achieve in reality. As such, development would most likely be limited to a single, detached dwelling or potentially a duplex style development at densities more commonly understand as sitting in the realms of medium density development.

- 8.4 However, I consider that the rule would benefit from further clarifications on features that the 8m x 15m shape must be free from (e.g. access easements) to ensure that a viable dwelling could still be constructed.
- 8.5 In terms of the areas and dimensions proposed within PC26. I consider that these are excessively large and are more closely aligned with low-density residential development and therefore inconsistent with the purpose of the MDRZ (and HDRZ).

9. COMMERCIAL ZONE

- 9.1 The Operative District Plan has a single Commercial Zone which covers retail, office, industrial and commercial service areas of Cambridge and Te Awamutu.
- 9.2 The current Commercial Zone maximum height limit is 14m which applies across the hierarchy of uses described above. A variety of activities are promoted within the Commercial Zone including residential activities so long as they are located above ground floor level, have appropriate on-site amenities, and can manage the potential impact of locating near commercial activities.
- 9.3 As part of the submission process, Kāinga Ora sought to apply a height variation control over the Cambridge and Te Awamutu Town Centres to enable a height of up to 24.5m. Paragraphs 9.5.4 of the s42A report, rejects this request and states that "*the currently permitted height of 14 metres and densities enables a greater level of height and density which is not currently realised within the commercially zoned areas of the district.*"
- 9.4 The s42A report goes on to note that "as a result of submissions received and preliminary pre-hearing engagement with Kāinga Ora,

Council is considering potential opportunities to better differentiate the commercial 'centres' of Cambridge and Te Awamutu" from the other settlements within the Waipā District due to their position within the hierarchy of centres. It is currently unclear what this differentiation will look like.

- 9.5 Subsequent to lodgement of Kāinga Ora's primary submission, further spatial and economic analysis was undertaken to determine the appropriateness of the requested spatial extent of the HDRZ and Business Height Overlay. This has resulted in a revised position where Kāinga Ora no longer seeks application of the HDRZ within Te Awamutu. In addition, the extent of the Business Height Overlay has also been reduced in extent (west of Mutu Street and south of Vaile Street/ Albert Park Drive) to utilise road corridors and/ or open spaces to provide a transition space between the MDRZ and the commercial zone where increased height is still sought. The boundary now more closely aligns with the town centre of Te Awamutu and will ensure a greater degree of separation can be provided around taller commercial/ mixed-use buildings that utilise the building height overlay. Further remnant parts of the commercial zone will also provide a transition in height/ scale of buildings in places.
- 9.6 From an urban design perspective, and consistent with national policy direction, it is preferable to promote and enable the intensification of existing urban areas which would better support the use of active modes of transport, reduce private vehicle use (and associated greenhouse gas emissions) and contribute to a more vibrant, well-functioning centres. Centre based residential opportunities also provides for increased choice for apartment typologies with differing characteristics that are valued by some people.
- 9.7 Modelling undertaken by Mr Phil Osborne¹⁵ indicates that existing height limits do not support feasible levels of development at 14m. Feasible development potential increases significantly at the 24.5m sought by Kāinga Ora in both Cambridge and Te Awamutu. Such

¹⁵ Paragraph 23, Evidence in Chief, dated 06/04/2023

heights remain modest, in my opinion, for a town centre environment and are commensurate with the level of existing services available within these centres as well as their potential future uses in response to growth (and including their role as 'metropolitan centres' in Future Proof).

- 9.8 I also note that the Commercial Zone area within Cambridge and Te Awamutu sought for an increase permitted height limit sits within character precincts and are subject to the "design guidelines" appendix. Any changes to permitted building heights would directly conflict with DG2.7.1(d) and DG3.5.5. These provisions note that "building heights should reflect and be sympathetic to surrounding built form. The majority of buildings located along the main street of Te Awamutu [and Victoria Street of Cambridge] are double or single storey and this height limit should be maintained. In my opinion, a consequential change to these guidelines would be required. This could include a general relaxation of the guidelines around height or potentially consideration of building setbacks above two storeys such that taller building elements appear more visually recessive and/ or are partially screened/ obscured from view from the main streets of Cambridge and Te Awamutu.

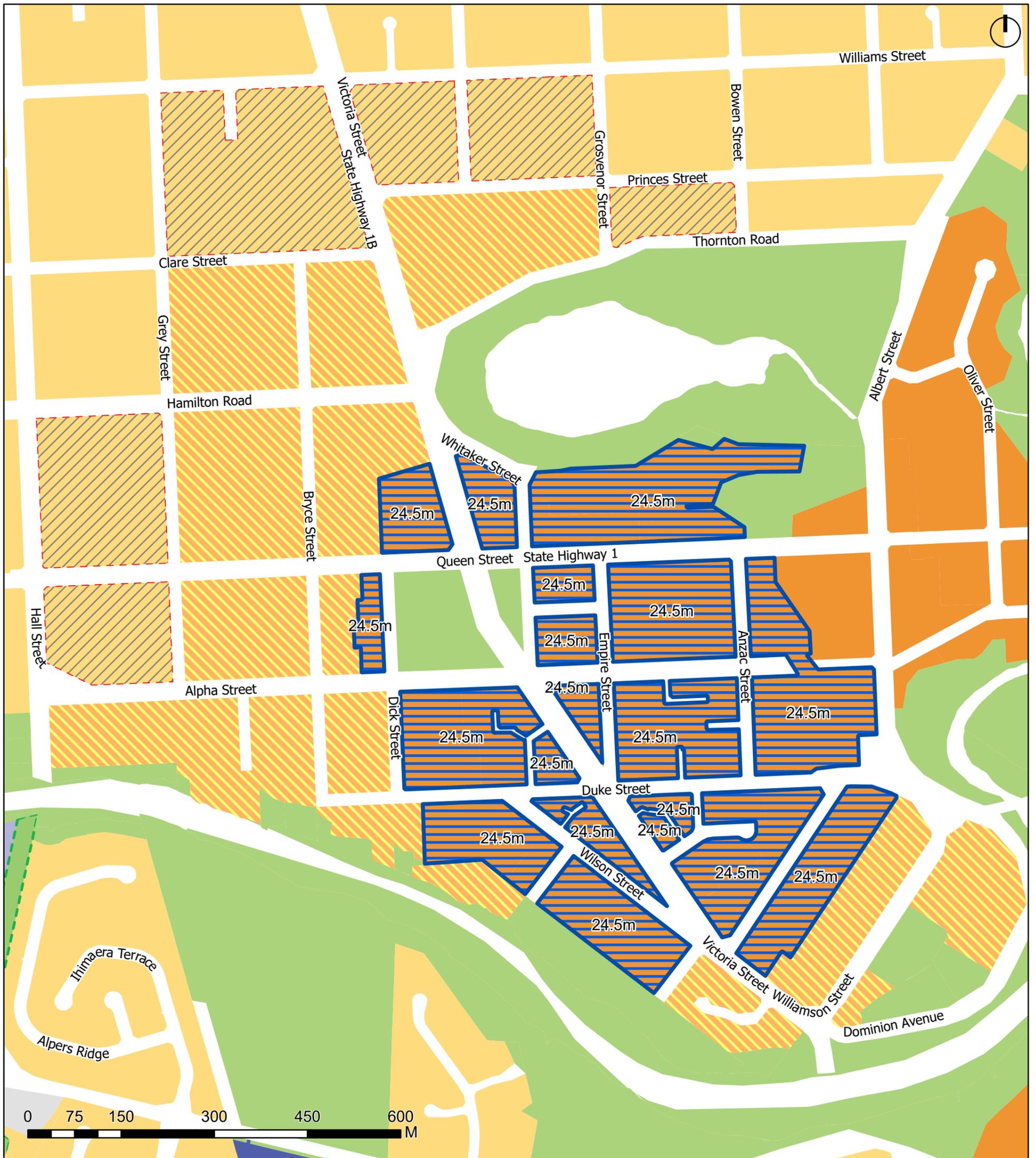
10. CONCLUSIONS

- 10.1 In my opinion, the relief sought by Kāinga Ora including subsequent amendments set out in my evidence and that of Mr Campbell, will result in improved urban design benefits than those proposed as part of Council's amendments to PC26. They will also better align anticipated design outcomes with the intent of the NPS-UD.



Cameron Wallace
06 April 2023

Attachment A – Revised Planning Maps



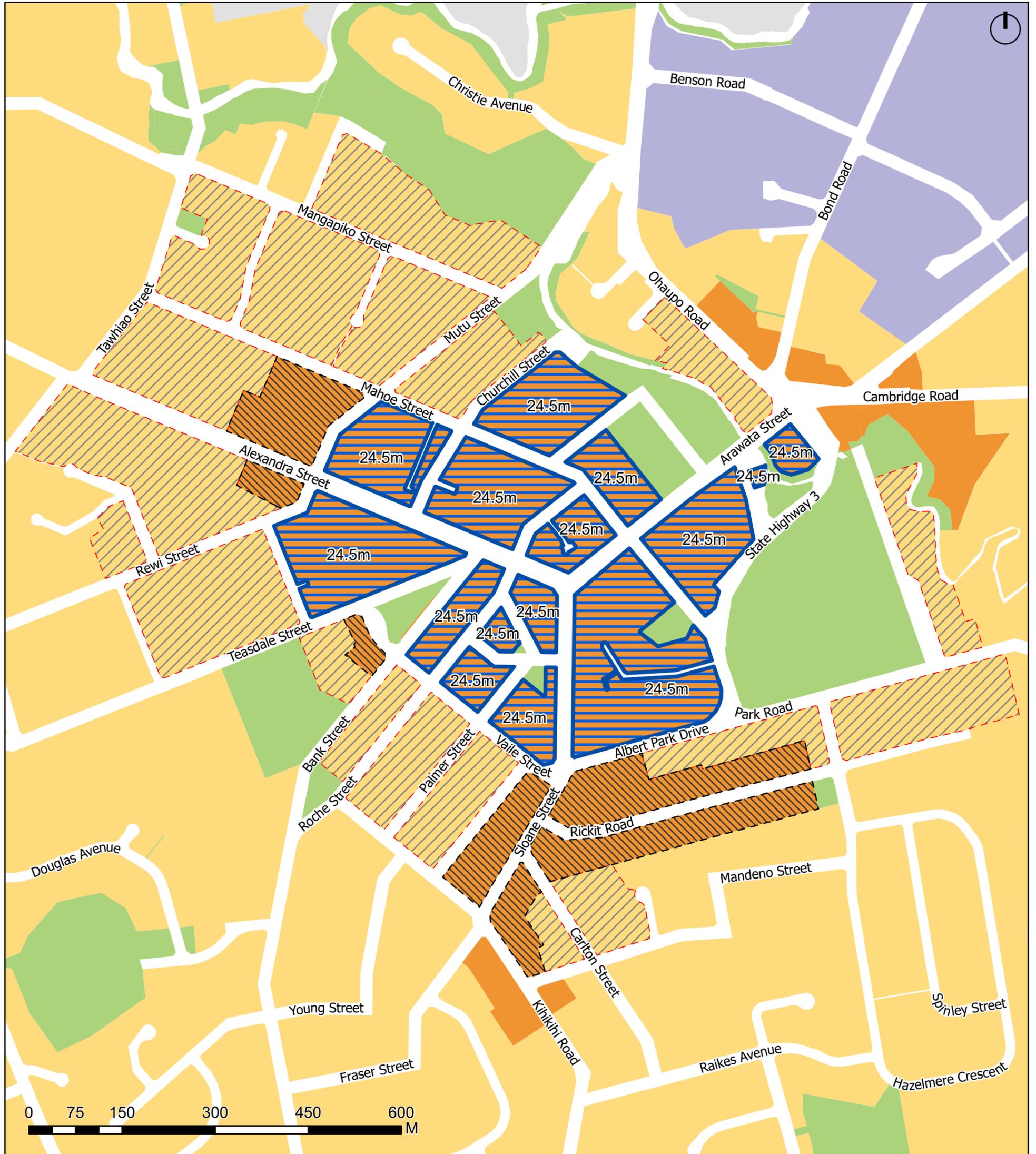
Kāinga Ora Proposed Changes Sought

- Business Height Variation Overlay
- High Density Residential Zone
- High Density Residential Zone Extent (Primary Submission - relief no longer pursued)

Proposed Plan Change 26

- COMMERCIAL ZONE
- DEFERRED RESERVE ZONE
- INDUSTRIAL ZONE
- MARAE DEVELOPMENT ZONE
- RESERVE ZONE
- MEDIUM DENSITY RESIDENTIAL ZONE
- RURAL ZONE

Te Awamutu



Kāinga Ora Proposed Changes Sought

-  Business Height Variation Overlay
-  High Density Residential Zone Extent (Primary Submission - relief no longer pursued)
-  Business Height Variation Overlay (Primary Submission - relief no longer pursued)

Proposed Plan Change 26

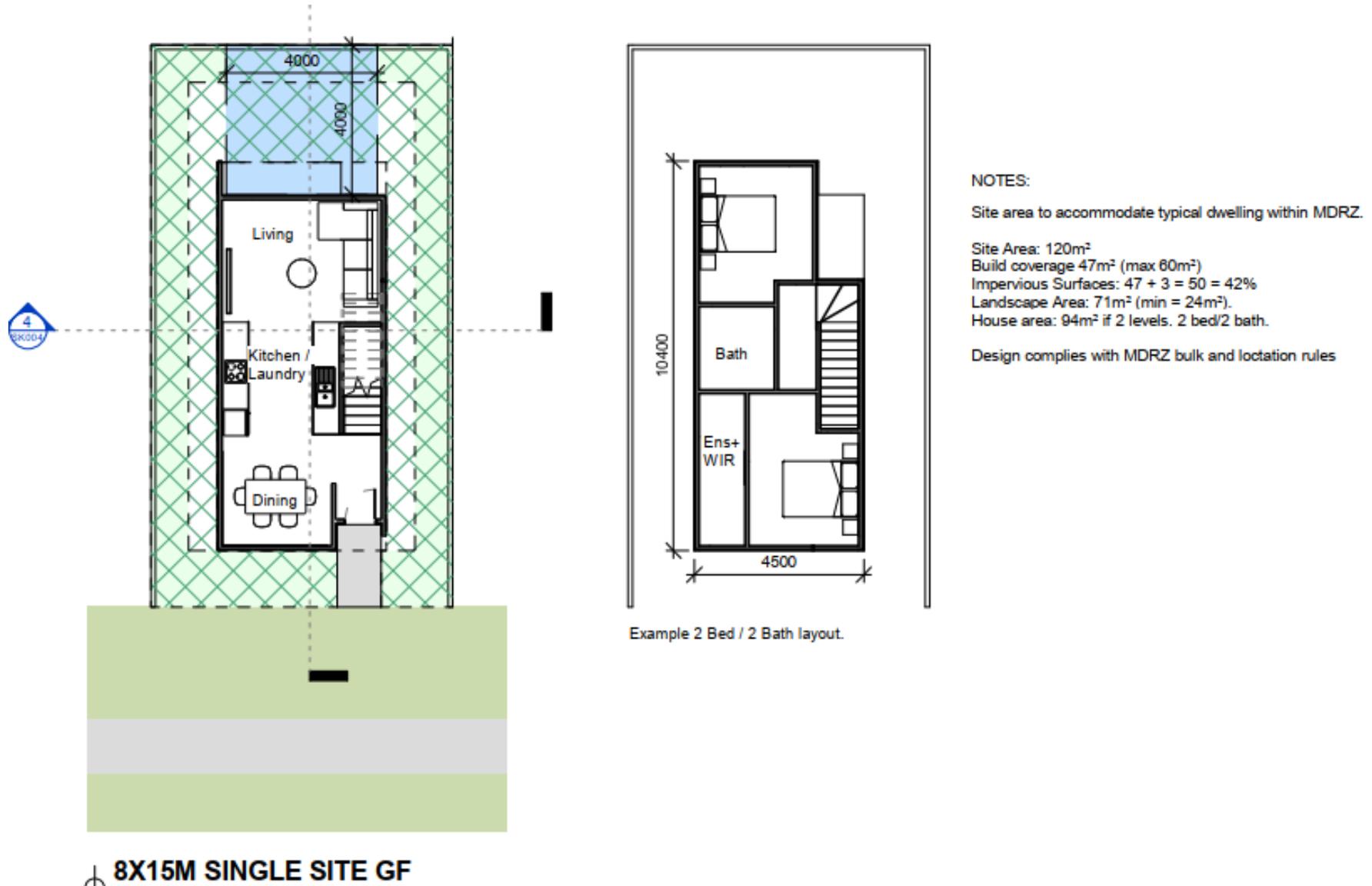
-  COMMERCIAL ZONE
-  INDUSTRIAL ZONE
-  RESERVE ZONE
-  MEDIUM DENSITY RESIDENTIAL ZONE
-  RURAL ZONE

Attachment B – Vacant Lot Modelling

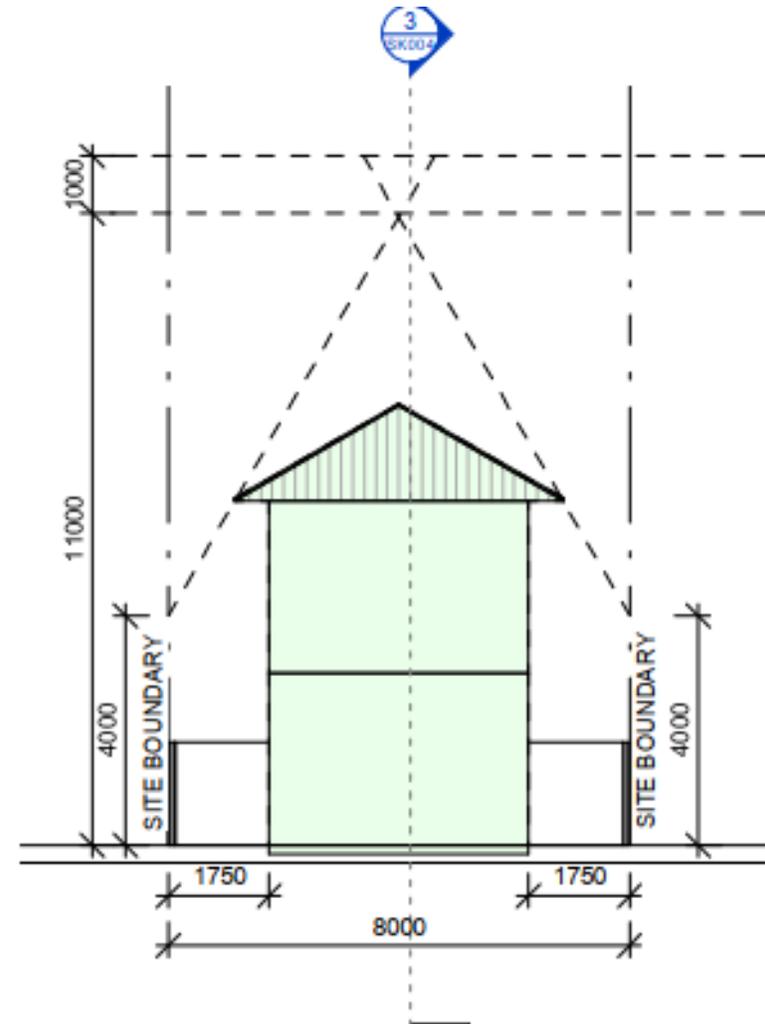
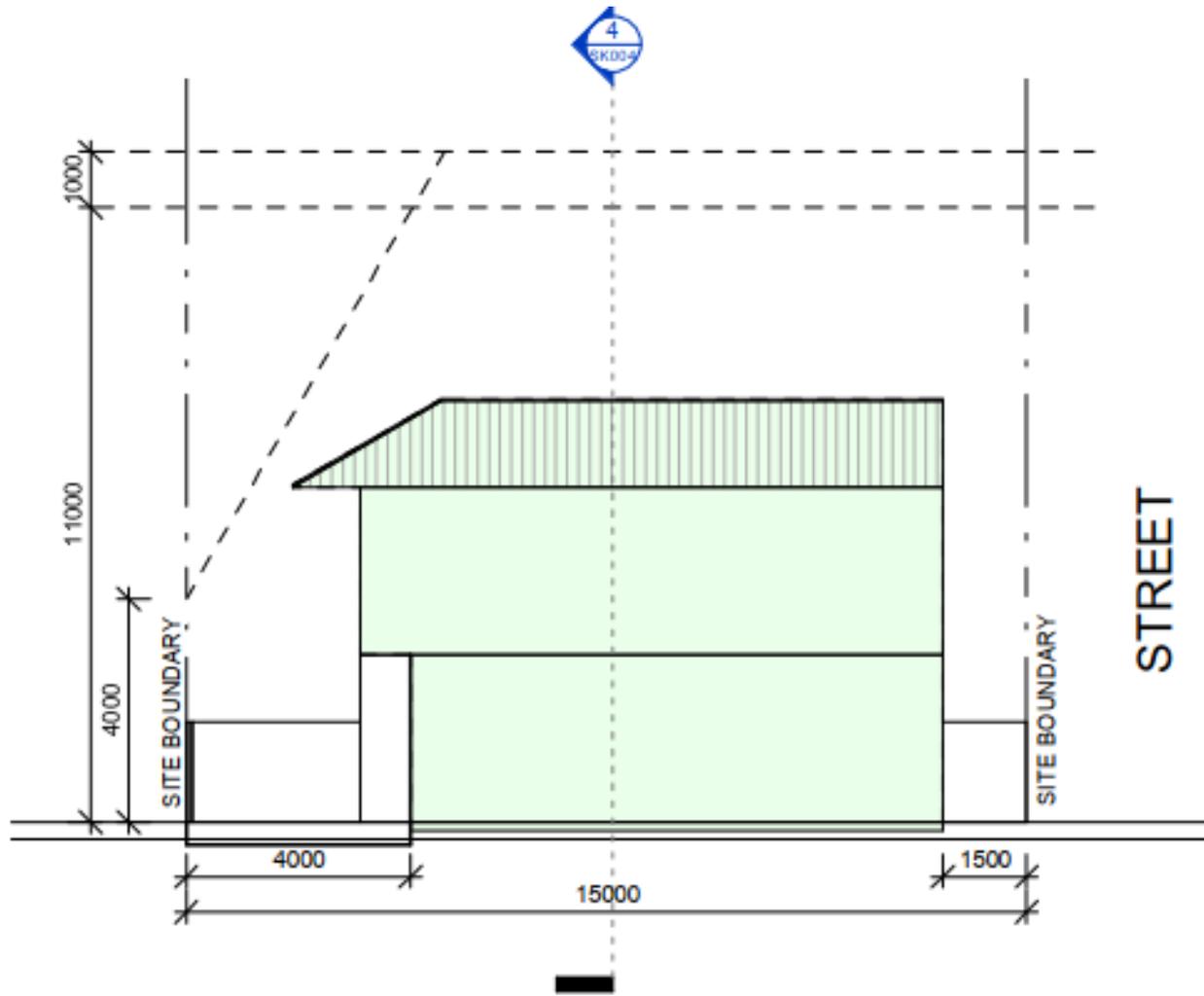
Determining minimum lot size

- Architectural testing to determine minimum size to accommodate the MDRS
- Testing to work out minimum size required to accommodate one “typical” residential unit in full compliance with all MDRS
- Clause 10 provides for up to 3 residential units per site as permitted – this is applicable to intensification rather than vacant lot subdivision
- MDRS provides for building height sufficient for three storey building
- 75% of housing occupied by single/two-person
- Two storey reflects commonly found development
- Architectural testing shape factor of 8m x 15m allows for two storey, two-bedroom dwelling of 94m² on 120m² site.

Testing of “typical” MDRS dwelling



Testing of “typical” MDRS dwelling



“Typical” existing housing stock – floor area approximately 70m²

