
urban design assessment
PRIVATE PLAN CHANGE REQUEST
1, 3, 5, 7, 10 & 12 FLORENCE CARTER AVENUE
FLAT BUSH

for

JKGL GROUP LTD

by

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executive summary

This report documents an independent analysis of an application for a Private Plan Change made by JKGL Group Ltd on a 9.34ha site at 1, 3, 5, 7, 10 & 12 Florence Carter Avenue, Flat Bush. The site is currently zoned Business - Light Industry and is proposed to be changed to Business - Mixed Use. The application has been made to Auckland Council under the Resource Management Act 1991 ("RMA") and in terms of the provisions of the Auckland Unitary Plan (Operative in Part) "**AUP: OP**". The key conclusions of this report are that:

- a. The existing zoning enables built form of a low-to-modest quality and is unlikely to respond ideally to the site's context and urban design opportunities, specifically the local centre and residential zones adjacent to the site; the large public open space abutting the site to the immediate south; and the width and scale of both Ormiston and Te Irirangi Roads. The Mixed Use zone is more likely to result in development that positively responds to those characteristics and contributes to a high-quality urban node around this major transport junction.
- b. The site's previous subdivision and approved resource consents have established a framework of lots which are of dimensions and orientations that lend themselves to workable and well-laid out Mixed Use building footprints.
- c. The loss of 9.34ha of Light Industry-zoned land in this part of Auckland will not give rise to any urban design effects of concern, and overall the change to Mixed Use zone is a considerably more efficient use of land within walkable access of a Local Centre zone and schools, and along major passenger transport routes. The change will also be very likely to result in much-improved built form outcomes.
- d. The proposed additional height overlay, for buildings up to 28m tall, has been located logically within the site and well away from any external road boundary. The overall flatness of Flat Bush means that the additional height will likely be screened from the immediate environment by buildings along the site's frontage within the zone height limit, and will not be prominent or block any existing views from within the wider environment.
- e. The existing Mixed Use zone methods (including the additional height overlay) will be sufficient to manage the built form urban design effects of development on the land.
- f. No additional Plan methods are required to manage the interface along the site's western boundary with the existing Light Industry zone at 2, 4, 6 and 8 Florence Carter Avenue because that land is within the control of the JKGL Ltd and has already been consented by the Council for a supermarket / department store (2, 4 and 6 Florence Carter Avenue) and a trade supplies outlet (8 Florence Carter Avenue). The proposed Mixed Use zoning will not negatively impact these activities (and in the case of the supermarket and department store are likely to support them).

The Private Plan Change could be approved on urban design grounds subject to the recommendations outlined in this report.

contents

1.	Introduction	4
2.	Scope and involvement	4
3.	Urban design framework	4
4.	Site analysis	6
5.	Light Industry zone analysis	10
6.	Mixed Use zone analysis	12
7.	Additional Building Height analysis	16
8.	Which option best responds to the site's opportunities?	21
9.	Which option best responds to the AUP: OP strategic framework?	22
10.	Comments on Council staff review	24
11.	Conclusions	27

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1. introduction

- 1.1 This report documents an independent analysis of an application for a Private Plan Change (“PPC”) made by JKGL Group Ltd on a 9.34ha site at 1, 3, 5, 7, 10 & 12 Florence Carter Avenue, Flat Bush (“the site”). The site is currently zoned Business – Light Industry and is proposed to be changed to Business - Mixed Use. The application has been made to Auckland Council under the Resource Management Act 1991 (“RMA”) in terms of the provisions of the Auckland Unitary Plan (Operative in Part) “AUP: OP”.
- 1.2 The site has been the subject of recent subdivision to create Florence Carter Avenue and this subdivision has been formed and completed. Land under the control of JKGL Group Ltd adjacent to the site is subject to approved (but as yet unimplemented) land use consents for a supermarket and department store at 2, 4 and 6 Florence Carter Avenue, and a trade supplies outlet at 8 Florence Carter Avenue. That strip of land between the subject site and the Light Industry zoned land further west will act as a buffer between the land proposed to be up-zoned (were it to be accepted) and the remainder of the Light Industry zone area.
- 1.3 For full details of the proposal, the PPC application documents and assessments of Mt Hobson Group Ltd are referred to.

2. scope and involvement

- 2.1 I have been engaged by JKGL Ltd as its urban design consultant. I have provided commentary and suggestions to JKGL Ltd as it has developed its proposal but ultimately the proposal is its own.
- 2.2 I have visited the site on numerous occasions and also those publicly-accessible sites in the immediate vicinity including Rongomai Park, a tributary of the Otara Creek south of Rongomai Park, and the Botany Junction Local Centre.

3. urban design framework

- 3.1 Although historically focused on the way in which private space and development impacted on public space, ‘urban design’ now encompasses a wide range of potential considerations. This is best evidenced by the breadth of matters included in MfE’s 2005 New Zealand Urban Design Protocol. As a result of this breadth urban design analyses, when based only on preferred or ‘ideal’ urban design prerogatives, do not always match well with the specific

matters relevant to Resource Management Act proceedings. Practical challenges faced by urban designers working under the RMA include that:

- a. urban design outcomes only apply to the extent that they are relevant to the specific resource management issues raised by each specific proposal;
- b. RMA plans need to be interpreted in light of what the specific objectives and policies mean and with reference to the methods used by each Plan to implement those provisions – not against what outcomes an urban designer might consider to be preferred or ideal in pure urban design terms;
- c. the RMA provides for positive environmental effects but does not require them (unless a NPS or Plan requires them);
- d. a failure to achieve an ideal or preferred urban design outcome as a potential ‘missed opportunity’ is not the same as the creation of an adverse environmental effect, and is often irrelevant to whether or not what is proposed merits the granting of consent.

3.3 Having considered the relevant provisions of AUP: OP chapters B2 (RPS – urban growth and form), Appendix 1 (structure planning), H17 (Light Industry zone) and H13 (Mixed Use zone), the planning outcomes and environmental effects to be addressed can be considered through the following questions:

- a. what are the site’s context and urban design characteristics?
- b. what urban design outcomes does the current zone enable?
- c. what urban design outcomes would the Mixed Use zone enable?
- d. what additional effects would the proposed additional building height enable?
- e. what of the three zone options would best respond to the site’s identified context and urban design characteristics?
- f. what of the three zone options would best respond to the AUP: OP’s strategic planning framework in urban design terms?

3.4 The AUP: OP RPS Chapter B2 and Appendix 1 set out a process to ensure that land zoning contributes to the quality compact urban form sought by the Plan. This typically entails a process of structure planning and other constraint analysis so as to ensure that the land to be re-zoned is properly capable of accommodating the outcomes identified as most appropriate for it. Given that the subject site has already been found suitable for an urban zone; that the re-zoning sought sits within the same ‘family’ of business zones as the current zoning; and in particular that the site is small, it is not considered necessary to undertake a formal or full structure planning exercise or associated master plan concept. In urban design terms, and as illustrated by the key questions posed

above, the proposal is a relatively discrete matter that effectively amounts to an inquiry as to what of the zone options would provide for the most superior urban design outcomes.

4. site and context analysis

site analysis

- 4.1 The site's key urban design characteristics are:
- a. the site is 9.34ha in area, formed of two land areas bisected by Florence Carter Avenue. The road forms an "L" shape running north-south from Ormiston Road, and then after a 90° turn, east-west to Te Irirangi Drive. The 'northern' 5.18ha area of 1, 3, 5 and 7 Florence Carter Avenue sit north and east of Florence Carter Avenue enclosed by both Ormiston Road to the north and Te Irirangi Drive to the east. The 'southern' 4.16ha area of 10 and 12 Florence Carter Avenue sits south of Florence Carter Avenue and has Te Irirangi Drive to the east, Rongomai Park to the immediate south, and a common boundary with 8 Florence Carter Avenue to the west.
 - b. The site's frontage with Ormiston Road is approximately 216m, and the frontage with Te Irirangi Drive is approximately 235m (northern area and 190m (southern area).
 - c. The land slopes gently from south down to north, falling in elevation from approximately 28m to approximately 19m (9m fall), along a total length of 450m. This gives an average south-to-north gradient of 1(v): 50). This is effectively flat in real terms and is readily developable.
 - d. To the immediate west is 2, 4, 6 and 8 Florence Carter Avenue. This strip of land is controlled by the applicant and this land is zoned Light Industry. It does not form part of the application for re-zoning. A supermarket and department store development has been approved via land use consent for 2, 4 and 6 Florence Carter Avenue and a trade supplies outlet has been approved for 8 Florence Carter Avenue.
 - e. Further west is a 16.5ha site at 55 Ormiston Road. That land is occupied by a large-scale brewing facility (Lion Breweries) and is separated from the application site by the 146m depth of Florence Carter Avenue and the land at 2, 4, 6 and 8 Florence Carter Avenue. It is also zoned Light Industry.
 - f. To the south is Rongomai Park. This appears to be a "Suburb Park"¹. It is 10ha in area and includes several formed playing fields. It has a

¹ Based on the classifications used in the Council's *Open Space Provision Policy 2016*.

relatively large double-aisle car parking area along its Te Irirangi Drive frontage and a clubhouse facility (the “Rongomai Sports Centre”). It is currently the home of the South Auckland Rangers AFC. The reserve is zoned Sport and Active Recreation under the AUP: OP. South of the reserve is a tributary stream of the Otara Creek which has been protected with reserve zoning through to the west via Preston Road Reserve.

- g. North of the site is Ormiston Road. It is a major arterial road and is of a variable width (accommodating frequent turning lanes) but is typically 32m wide. Its cross section in the vicinity of the site includes 6m berms including 1.8m footpaths, on-road cycle lanes, 4 vehicular travel lanes (2 per direction) and a wide flush median including a solid median strip adjacent to the Ormiston Road / Te Irirangi Drive intersection. The road widens at the Te Irirangi Intersection to provide (eastbound) 1 x right turn lane, 2 x through lanes and a cycle lane, and a give-way controlled left-turn lane (that is approximately 2 x lanes wide). The road is not realistically crossable for pedestrians other than via the intersection traffic signal controls. There are bus stops directly outside the site.
- h. North of Ormiston Road is a 4.87ha area of Mixed Use zoned land centred around Bishop Lenihan Place. The road was originally a cul-de-sac from Ormiston Road but has at some point been connected through to Te Irirangi Drive. It is currently developed as a series of one-and-two-storey retail showrooms and light commercial services (including a petrol station). This development lacks a coherent public space quality, and resembles a series of stand-alone buildings linked by car parking areas around them.
- i. East of the site is Te Irirangi Drive. It is a major arterial road and is of a variable width (accommodating frequent turning lanes) but is typically 38m wide. Its cross section in the vicinity of the site includes 5m-to-6m berms including 1.8m footpaths, 4 x vehicular travel lanes (2 per direction) and a wide raised and planted median that includes a regularly-spaced pair of trees. The road widens at the Ormiston Intersection to provide (northbound) 2 x right turn lanes, 2 x through lanes, and a give-way controlled left-turn lane (that is approximately 2 x lanes wide). The road is not realistically crossable for pedestrians other than via the intersection traffic signal controls.
- j. East of Te Irirangi Drive is the Botany Junction Local Centre. This is comprised of 3.59ha of Local Centre zoned land and is currently configured with car parking around the road frontages (for a depth ranging from 20m to 40m from the road boundary). There are no footpath connections directly connecting the public footpath to a shopfront; all cross and must give way to vehicle carriageways. The buildings themselves contain a number of convenience retail, food and beverage, commercial services and offices in one-to-two-storey buildings. Overall, this arrangement would not be described as particularly successful in urban design terms.

- k. East of the Local Centre and its associated housing area (partly zoned Terraced Housing and Apartment Buildings, is Barry Curtis Park. It is a very large open space of regional significance, and is over 80ha in area.
- l. Immediately north-east of the site is the Ormiston Road / Te Irirangi Drive intersection. It is a large urban signal-controlled intersection 80m along its diagonal (boundary to boundary). It is a substantial and entirely paved space. Further north-east is a thin finger of recreation-zoned bush that forms part of the substantial Flat Bush stream reserve network.
- m. The immediate context is therefore currently very mixed, with all four corners of the intersection zoned for different land use outcomes. While this is not especially unusual, it is also not likely to contribute to a particularly coherent land use solution. In any event, it is also observed that the sheer size and scale of Ormiston Road and Te Irirangi Drive intersection inherently results in a severance between the different sides of the intersection. Being signal controlled however, there does exist safe opportunity for pedestrians and cyclists to access each side.
- n. In the wider environment, the built form pattern is a hybrid that, overall, lends itself more to the Post-WW2-to-2000 era than the post-2000 era where cul-de-sacs have become much less frequently tolerated. While a well-connected and quite rigidly linear super-grid of arterials and collector roads has been formed, within it a loops-and-swirls road pattern and a substantial (over) use of disconnected small cul-de-sacs have established. This is not what I would consider a model structure, and overall a more conscientiously designed deformed grid would have been more successful.
- o. More broadly, the locality has been caught 'in between' the AUP: OP process. Sites such as the subject site remain undeveloped and can be considered in light of the largely settled AUP: OP framework. However most of the locality was developed in the two decades immediately prior to the AUP: OP and present a number of challenges. Most notably, the Local Centre zone and adjacent Terraced Housing and Apartment Building zone had already been developed prior to the new zones coming into play. There appears theoretical capacity or further development within the Local Centre zone, such as on top of relatively large-scale at-grade car parking areas. The THAB zone is more problematic as it has been recently developed and subdivided into detached housing lots typically around 400m² – 600m² each and occupied by large family homes. To take advantage of the THAB zone provisions for high density housing predominantly between 5-7 storeys in height, it is likely that multiple lots would need to be amalgamated and recently built and still economically useful houses demolished. Overall, this can only reduce (substantially) the likelihood that the THAB zone will accommodate the outcomes sought by the AUP: OP for that zone (predominantly 5-7 storey apartment buildings) in the foreseeable future.

- p. Overall, the Ormiston Road / Te Irirangi Road intersection has not been well responded to in built form terms. The intersection is a major junction and is spatially large. Preferably, larger-scale buildings built to or close to the street would have occurred so as to spatially enclose it, provide pedestrian and cyclist amenity, enhance visual and sensory amenity, and promote passive safety at the intersection. The service station (north-western corner) and modest-height retail development set back over 20m behind at car parking area (south-east) underwhelm. The strip of bush does provide scale and enclosure to the north-east, but is an inactive edge.

site opportunities

4.2 On the basis of the above analysis, the following are the site's key urban design opportunities:

- a. The site, although formed in two parts, is flat and of a readily developable shape that could accommodate a number of built form outcomes.
- b. Multiple road frontages lend themselves to large-scale urban form outcomes moderated only by modest height in relation to boundary and front yard setbacks. The width of the roads also helps set back development on most sides.
- c. The site is close to a Local Centre and large-scale recreation reserve, as well as schools and bus services. Although Te Irirangi Drive and Ormiston Road are vehicle-dominated the site is very-well located to accommodate high-density and pedestrian-centric development (either residential or commercial).
- d. It is understood that the site is serviced and suffers from no infrastructure capacity limitation (other than road access).
- e. The site has been cleared for some time and does not accommodate any notable trees or known archaeological sites. This will allow more design freedom.
- f. The site is not subject to nor does it form part of any significant view shaft or general public view, in part due to how large and flat the local landform is. Due to the configuration of roads, the site also does not form part of any visual termination of a road axis (in terms of local landmarks).
- g. Moderate-to-high intensity development orientated to address the street and intersection could considerably improve what has to date been a low-quality, traffic-dominated environment.

site constraints

- 4.3 On the basis of the above analysis, the following are the site's key urban design constraints:
- a. The extent of road frontage around and within the site would require a substantial amount of activated frontage, which depending on the land use outcome proposed may not be achievable. This may expose lower-quality built form outcomes to public view.
 - b. Due to the heavily trafficked nature of both Ormiston Road and Te Irirangi Drive it is unlikely that additional vehicle access other than Florence Carter Avenue will be possible, making a true frontage interface more difficult along these roads.
 - c. The site has a large reserve immediately south. It would be desirable to utilise this from the point of view of maximising outlook and views, as well as promoting passive surveillance of the space – but it is also difficult to orientate some activities to face south due to a lack of solar access. Given the high number of users the reserve will accommodate at peak periods, it would be highly undesirable to locate a low visual quality built form outcome adjacent to the reserve.
 - d. The reserve to the south is also more sensitive to shading effects from development immediately north of it.

5. urban design outcomes enabled by the Light Industry zone

- 5.1 The subject site is relatively unconstrained and lacks any on-site or natural environmental constraint that might limit the ability to achieve the outcomes provided for by the AUP: OP Light Industry zone (chapter H17). The key urban design characteristics of the zone rules are:
- a. The zone is one of the few in the AUP: OP that has a true permitted baseline of activities that can establish without any resource consent or design oversight by the Council.
 - b. The zone has a building height limit of 20m, with a restricted discretionary activity consent required to exceed this (rule H17.6.1).
 - c. Relative to the public open space immediately south of 10 and 12 Florence Carter Avenue, a height in relation to boundary control of 6m + 35° applies. This has the effect of limiting the zone height limit of 20m to a setback of 20m from the southern boundary (rule H17.6.2). Given that a 5m side / rear yard setback applies, it is noted that the maximum

height a building at that point could rise to and comply with the HiRB plane is 9.5m.

- d. Relative to the road boundaries around the site, a HiRB plane of 6m + 35° applies from the 'far' side of each road. This means that:
 - i. Relative to the 'internal' Florence Carter Avenue (23m wide), a 20m building would not require any set back to comply (the HiRB compliant height measured at a 2m front yard setback would in fact be 23.5m).
 - ii. Relative to Ormiston Road (varied width but typically 32m), a 20m building would not require any set back to comply (the HiRB compliant height measured at a 2m front yard setback would in fact be 29.8m).
 - iii. Relative to Te Irirangi Drive (varied width but typically 38m), a 20m building would not require any set back to comply (the HiRB compliant height measured at a 2m front yard setback would in fact be 34m).
- e. As noted above, rule H17.6.4 requires a 2m Front Yard setback, and 5m Side and Rear Yard setbacks.
- f. Rule H17.6.5 requires that any rubbish or storage areas visible to an adjacent residential or open space zone must be screened.
- g. The zone restricts certain activities (not expressly the buildings for those activities) within 30m of a residential boundary. The only such boundary is to the east across Te Irirangi Road, more than 30m away. As such rule H17.6.0 is not considered to apply to the site.
- h. Subject to the above rules, it is a permitted activity to establish activities and buildings provided that they comply with the requirements of the zone Activity Table in rule H17.4. This provides for such outcomes as:
 - i. Drive through restaurants;
 - ii. Garden centres, motor vehicles sales yards and marine retail (that are each more than 100m from a Heavy Industry zone);
 - iii. Trade suppliers;
 - iv. Service stations;
 - v. Industrial activities;
 - vi. Storage and lock-up facilities; and
 - vii. All new buildings associated with the above.

- i. In terms of the activities listed in (h) above, it is noted that these could take the form of large, bulky or boxy buildings with no positive design attributes whatsoever. They could also be set back to an unlimited distance from the front boundary with car parking provided in front. There is no requirement for front yard landscaping or any visual amenity at all. I have consulted the zone policies in this respect and note that they provide no expectation of “within zone” amenity at all; only amenity effects on adjacent open space and residential zones are to be managed, and in the first instance only by building bulk and location rules.
- j. Based on the above, I consider that the Light Industry zone enables low-to-modest quality urban design outcomes and for the most part enables them from the point of view of promoting economic productivity and efficiency. It is also acknowledged that the zone does this so as to prioritise Light Industrial activities based on the social and economic benefits the community can derive from those activities.
- k. It is noted that there are no rules or policies that would prevent a landowner seeking to achieve a high-quality built form outcome, provided that the activity being accommodated was provided for within the zone. To that end it is noted that H17.4 seeks to limit residential, general retail, offices, and larger-scale community facilities from establishing within the zone. This is primarily to ensure that reverse sensitivity effects are managed so as to not undermine the zone’s ability to provide for the uses intended within it.

6. urban design outcomes enabled by the Mixed Use zone

- 6.1 In terms of the Mixed Use zone that is proposed for the land, the key issue is the extent to which it may undermine the Light Industrial zone to the west, the open space zone to the south, Ormiston Road or the Mixed Use zone to the north, or Te Irirangi Road, the Local Centre, and the Terraced Housing and Apartment zone (and sliver of Mixed Housing Urban zone) to the east.
- 6.2 I consider that the key issue is that of the integrity of the balance of the Light Industry zone to the west. In this respect, retention of 2, 4, 6 and 8 Florence Carter Avenue as Light Industry zone to act as a buffer to the Light Industry zoned land further west is in my opinion a very successful strategy. This provides a buffer of approximately 146m depth, which is in my opinion sufficient to mitigate any reverse sensitivity effects that the Mixed Use zone could have on the Light Industry zone. I am also satisfied that the combination of setbacks and the compatibility of the Mixed Use zone to the existing zones further north and east is such that there are no “fundamental” constraints to be considered. In terms of the open space zone to the south, I note that the Mixed Use zone contains specific provisions to manage development adjacent to it and for that

reason I do not consider there are any “fundamental” urban design issues that need to be factored into the analysis.

6.3 As such, my opinion is that the Mixed Use zone provisions can be considered for the site in their entirety. The key urban design characteristics of the zone rules are:

- a. The zone, as with the centre zones and most large-scale development within the Terraced Housing and Apartment Buildings zone, requires resource consent to be obtained as a restricted discretionary activity including for new buildings. This is to ensure that built form outcomes achieve a suitable quality. Although ‘urban design’ is not mentioned, many of the zone policy outcomes are plainly urban design-related. This is fundamentally **more restrictive** than the Light industrial zone that currently applies to the site.
- b. The zone has a standard building height limit of 18m, of which only 16m can be “occupiable” (to promote visually interesting building shapes), with a restricted discretionary activity required to exceed this (rule H13.6.1). This is **more restrictive** than the current height limit within the Light Industrial zone (and is tied into a restricted discretionary activity consent requirement for new buildings).
- c. Relative to the public open space immediately south of 10 and 12 Florence Carter Avenue, a height in relation to boundary control of 8.5m + 45° applies. This has the effect of limiting the zone height limit of 18m to a setback of 9.5m from the southern boundary (rule H13.6.2). Relative to the existing Light Industry zone 5m side / rear yard setback that currently applies on the site, it is noted that the maximum height a building at that point could rise to and comply with the HiRB plane in the Mixed Use zone is 13.5m (4m taller than the Light Industry zone equivalent). This is **less restrictive** than the current Light Industrial zone HiRB requirement (but is tied into a restricted discretionary activity consent requirement for new buildings). Overall however, I consider that the combination of additional building mass coupled with what is much more likely to be a well-designed building featuring windows and openings facing and overlooking the park will balance each other out and result in an outcome no worse than, and potentially better than, the Light industry zone provides for.
- d. Relative to the road boundaries around the site, no HiRB plane applies within the Mixed Use zone relative to other business zones, but a HiRB plane of 8m + 60° applies from the ‘far’ side of Te Irirangi Drive relative to the Terraced Housing and Apartment Buildings zone:
 - i. No building setback would be required to accommodate an 18m tall building at the site’s front boundary (the HiRB compliant height measured at a 0m front yard setback would in fact be 73.8m).
 - ii. It is noted that the site at 10 Tonu’U Court is opposite the site across Te Irirangi Drive but is zoned Mixed Housing Urban zone.

For that site, the relevant HiRB plane is 3m + 45° measured from the 'eastern' side of Te Irirangi Drive. Relative to that site, no building setback along the subject site's front boundary would be required to accommodate an 18m tall building (the HiRB compliant height measured at a 0m front yard setback would in fact be 41m).

- iii. Compared to the Light Industry zone that currently applies to the site, this is a **less restrictive** standard (but is tied into a restricted discretionary activity consent requirement for new buildings).
 - e. Rule H13.6.5 provides for no yard setbacks on the front, side or rear boundaries of the site. This is a **less restrictive** standard compared to the Light Industrial zone (but is tied into a restricted discretionary activity consent requirement for new buildings).
 - f. Rule H13.6.6 requires that, where car parking is provided along a front boundary in front of a building, a 2m deep landscaping buffer be provided. This is **more restrictive** when compared to the Light Industrial zone (and is tied into a restricted discretionary activity consent requirement for new buildings).
 - g. Rule H13.6.0 requires consent to be granted for certain activities within 30m of a residential zone (this is **equivalent** to the Light Industry zone), but as is the case for the Light Industry zone, the rule does not apply to the site and would be additionally subject to the 'new buildings' consent requirement.
 - h. Unlike the Light Industrial zone, the Mixed Use zone (H13.4) provides for dwellings, relatively small office and retail activities, and community activities. In this respect the zone provides for different outcomes, and in my opinion generally at a higher density, than is expected for the Light Industry zone and this is a key difference between the two zones.
- 6.4 In terms of the zone policy framework, several policies refer to the management of adverse effects, and the requirement for development to positively contribute to the environment. This requirement for "positive" outcomes is not found within the Light Industry zone and, given that the promotion of positive effects and benefits of development is a key objective of urban design (as well as just limiting adverse effects), this is a distinct urban design benefit that the Mixed Use zone possesses over the Light Industry zone. The policies, as a part of this, also provide a distinct recognition of the importance of pedestrian amenity, safety, and visual quality of streets. This is, again, a notable advantage of the Mixed Use zone over the Light Industry zone.
- 6.5 Overall, I consider that the Mixed Use zone is considerably more focused on quality urban design outcomes than the Light Industry zone, and in so doing is considerably more restrictive than the Light Industry zone. The requirement that all new buildings obtain resource consent provides the Council with design

oversight of all new buildings, including the design and location of on-site parking areas.

- 6.6 On the basis of the above, I consider that the proposed change of zones could have only positive built form and urban design effects on all adjacent sites, zones and public open spaces including of note the roads. The requirement for resource consent to be sought for new buildings subject to a number of visual amenity and built form-based policy outcomes will ensure that high-quality outcomes are provided. I also consider that an activity emphasis on housing and high density (small-scale) commercial uses will provide more (pedestrian and cycle) users for the adjacent public open space networks, bus services, and many shops and commercial services within the existing Local Centre and Mixed Use (north of Ormiston Road) areas. These are in my view positive effects for those adjacent land uses and zones. This is particularly relevant to the policy framework for the centres zones as a whole and the importance of reinforcing the community focal point role of the Local Centre zone. A potentially substantial increase of residents very close to the centre will in my view be very desirable for the short-and-medium terms given how the centre's own THAB zone has been already developed at what I would describe as an inefficient half-way-house between Single House zone and Mixed Housing Suburban zone outcomes, and that the centre's wider catchment accommodates so much roading and public open space (further reducing the walkable local population).
- 6.7 In my view a high-density development built to positively contribute to the quality of the public streets, and to provide passive surveillance and activation of Te Irirangi Drive and Ormiston Roads, are also notable positive urban design effects likely as a result of the re-zoning.
- 6.8 In terms of adverse urban design effects arising from the re-zoning, even with the slightly lower height limit, it is likely that larger-scaled buildings near street boundaries and the Rongomai Park boundary will eventuate. This will result in more shadowing and visual dominance effects on those spaces than I consider would be likely under the Light Industry zone (balanced by being of higher visual quality and including more probable passive surveillance and overlooking benefits). The resource consent process in place would in my opinion be capable of ensuring that any such adverse bulk and mass effects were appropriate however. I do not consider that the Mixed Use zone would have any material urban design effect (including any discernible amenity effect) on the Light Industry zone at 55 Ormiston Road or further west given the scale of the Light Industry zone buffer proposed (146m).
- 6.9 It is acknowledged that a reduction of Light Industry zone is itself a strategic environmental effect relating to the ability of the city to provide a sufficient quantity and mix of jobs. While measuring the significance of this impact is not of itself an urban design effect, the following urban design reasons are relevant from the point of view of giving confidence that the re-zoning proposed will not give rise to any 'precedent' type effect that might cast a shadow of lost employment land beyond the size of the subject site itself:

- a. The site provides a 146m buffer of Light industry zoned land between it and any other Light Industry zoned land to the west as a means of avoiding reverse sensitivity effects on that zone.
- b. The site is already interfaced by a number of other zones to the south (open space), east (Terraced Housing and Apartment Buildings and Local Centre), and north (Mixed Use). For all of those zones, the Mixed Use zone proposed is more compatible and will be more reinforcing of the outcomes they are intended to accommodate than the Light Industry zone.
- c. The site is small, at only 9.34ha, and it is in my view well below the scale that could be regarded as giving rise to any regional significance.
- d. The presence of bus stops along Ormiston Road directly outside the site lends itself to high density housing rather than lower-density (and often car-based) Light Industry uses.

7. additional effects likely from the additional building height sought

- 7.1 In addition to the re-zoning of land from Light Industry to Mixed Use, the proposal is to also increase the permitted activity standard for height within the new zoned area. This is based on a graduated series of isochrones as follows:
 - a. 20m maximum building height at the site's 'external' front boundaries (this is as per the existing Light Industry zone).
 - b. 26m maximum building height, set back a minimum of 24m from the site's 'external' front boundaries.
 - c. 28m maximum building height, set back a minimum of 26m from the site's 'external' front boundaries and also from Rongomai Park.
 - d. In respect of all of the above, it is understood that the Mixed Use zone's occupiable height limit (2m below the stated maximum) would also apply.
- 7.2 In terms of properties zoned Light Industry to the **west**, I consider that the additional building height sought would have negligible adverse effects given the 146m separation proposed between the additional height and the nearest 'external' neighbour, being the Lion Brewery site at 55 Ormiston Road. No additional shadowing, reverse sensitivity, or other adverse effects are likely to be measurable at the 55 Ormiston Road boundary, and certainly not sites beyond that site.
- 7.3 In terms of properties zoned Mixed Use to the **north**, my analysis is that any additional adverse urban design effects would be less than minor and appropriate for the following reasons:

- a. No shading effects would eventuate.
- b. The uses on the north side of Ormiston Road include a petrol station set well back from the street, the side of a retail strip that faces east (away from the subject site), and a storage facility. None of these derive any particular visual or other amenity from the subject site, and no users of those facilities experience any lasting or important views to or over the subject site.
- c. The total separation between the building height 'tiers' and users of the land to the north would be in the order of 32m, (to 20m height), 56m (to 26m height), and then 82m (to 28m height). I am satisfied that the proportionately greater horizontal depth that applies to additional height will make each 'tier' notably more recessive and 'smaller' than the 'tier' beneath it. The first 20m of height, which will be 2m greater than the default Mixed Use zone limit, would form the majority of all built form effects experienced from the land on the north side of Ormiston Road, and due to the 32m separation distance this would of itself be immaterially different to an 18m height.
- d. The height tiers, given the size of the sites, lends itself to a greater variety of building heights within the site and a more interesting skyline. This is in my view less of a new positive effect, but will help mitigate the overall effects of building height within the site and serve the AUP: OP approach of seeking to promote variation in roof profiles within the zone.

7.4 In terms of the Local Centre zoned land, the Terraced Housing and Apartment Building zoned land, and the Mixed Housing Urban zoned land (10 Tonu'U Court) to the **east**, my analysis is that any additional adverse urban design effects would be less than minor and be appropriate for the following reasons:

- a. Shading effects would be limited to late afternoon and the buildings would comply with the relevant Height in Relation to Boundary controls. In the afternoon period, I am satisfied that the horizontal depth of the height 'tiers' is sufficient to internalise the majority of additional shading created by the height such that additional shading would be immaterial when compared to an 18m tall building.
- b. The central median trees will continue to grow and their canopy spread will screen much of the buildings. By way of reference, and relative to a 1.67m tall eye level of a viewer at the boundary of the residential zones on the eastern side of Te Irirangi Road, the central median trees that are approximately 15m from the boundary only need to be 8.92m tall to appear as tall (or taller) than buildings 20m tall on the subject site front boundary with Te Irirangi Drive, or only 4.79m tall to screen 28m tall buildings 50m back from the subject site's front boundary. The first 20m of height, which will be 2m greater than the default Mixed Use zone limit, would form the majority of all built form effects experienced from the

land on the north side of Ormiston Road, and due to the 32m separation distance this would of itself be immaterially different to an 18m height.

- c. The residential properties that front Te Irirangi Drive include fencing and vegetative screening to provide an amenity buffer from Te Irirangi Drive itself.
- d. The additional height, given the size of the sites, lends itself to a greater variety of building heights within the site and a more interesting skyline. This is in my view less of a new positive effect, but will help mitigate the overall effects of building height within the site and serve the AUP: OP approach of seeking to promote variation in roof profiles within the zone for that purpose.
- e. The combined distance of 88m between the residential zone boundary and the closest point where a 28m tall building could eventuate is substantial and, in my view, sufficient to mitigate bulk, scale and form effects.
- f. The additional height would not block any notable views that materially contribute to the sense of place or character / amenity values of the land on the eastern side of Te Irirangi Road.

7.5 In terms of the Ormiston Road and Te Irirangi Drive **streetscapes**, my analysis is that any additional adverse urban design effects would be indiscernible in front of the site, and otherwise less than minor, and be overall appropriate for the following reasons:

- a. The additional height is sufficiently setback that it will have no discernible impact on either Te Irirangi Drive or Ormiston Road. Even from the far-side footpath, the additional building height of 6m setback 24m, and 8m setback 50m, will be so offset that the leading edge of the 'front' building at the road boundary would entirely screen the additional building height (even if the leading building was only 18m tall this would still be the case).
- b. In any event, occupants of vehicles and buses moving along the roads will be transiting at a speed whereby the site will be passed in a matter of seconds, or where the traveller's attention will be likely focused at the lower 'first 20m' height.
- c. For pedestrians further along the footpaths (i.e. not standing directly in front of the subject site), it would be possible to see the additional height rising above the 'front' 20m, but my calculations are that this distance would need to be at least 97.6m (to see the 26m height @ 24m setback and @1.67m eye level), or 165m (to see the 28m@ 50m setback). I consider that these distances are sufficient that any built form effects of visual amenity, visual dominance, and any other bulk or mass effects would be almost entirely mitigated. For completeness, the separation distances above would be reduced to 73.1m and 134m respectively if

the 'front' buildings were reduced from the 20m proposed to the 18m provided for in the standard Mixed Use zone rule; this would still be sufficient to achieve substantial mitigation of the additional height. In all of these scenarios, I consider the additional adverse effects of the building height on the street to be less than minor and on the basis that the restricted discretionary activity resource consent will lead to much higher visual quality buildings than permitted activity 20m high buildings in the existing Light Industry zone, and this probability of higher visual quality also helps to mitigate the adverse shading and bulk effects of the additional height proposed.

- 7.6 In terms of Florence Carter Avenue **streetscape**, my analysis is that any additional adverse urban design effects would be minor and be appropriate for the following reasons:
- a. The proposal would allow for buildings up to 28m tall at the street. This would result in notable morning shadowing greater than the 18m standard zone allowance of 20m height otherwise proposed along public streets. The east-west section of the road would also be subjected to more all-day shadowing.
 - b. The street is a lower-order street likely to be used only by persons visiting one of the sites served by Florence Carter Avenue, all under the control of the applicant. As such, the additional height will be seen by a much smaller number of persons than would occur along Ormiston Road and Te Irirangi Drive.
 - c. New buildings will be subject to all of the zone's design requirements including that the top of the building be designed to be visually interesting.
 - d. The key difference between an 18m tall building and one at 28m tall equates to 5 storeys in height (18m) versus 7 storeys (28m). In either scenario, I consider that a medium-rise, moderate intensity building outcome is likely, each with similar characteristics relative to how building mass is aligned with the street.
 - e. The street has a 23m width, giving it a greater spatial proportion to accommodate building height at either side without becoming inappropriately over-scaled or subject to adverse visual dominance effects. The enclosure ratio proposed would become at worst 1(v):1.2(h); if the street were a more conventional 15m-width local road, then this would become 1(v):1.9, a considerably different spatial proposition.
 - f. Notwithstanding the above, I would not oppose a regime of tiered setbacks along Florence Carter Avenue, although in my view the greatest overall benefit would be had from the southern boundary of 5 and 7 Florence Carter Avenue from the point of providing more day-time sun and daylight into the east-west leg of the street. The downside of

providing setbacks to this lower-order road is that whereas Ormiston Road Te Irirangi Road are wide and provide outlook over the local node and intersection (and face north for Ormiston Road), and are likely to have buildings front them, on the internal road a setback of height is more likely to result in at grade parking areas being provided at the external perimeter, and buildings located internally where the height limit is most generous. Avoiding this makes it more likely that car parking can be either underground or, if at grade, internalised behind buildings. Because of this, my overall preference is to retain the additional height limits as proposed to the Florence Carter Avenue road boundaries rather than introduce additional height setbacks here.

- 7.7 In terms of Rongomai Park to the **south**, my analysis is that any additional adverse urban design effects would be slightly more than minor but would be appropriate for the following reasons:
- a. At face value the proposed plan provides for 26m height at the reserve boundary and 28m at a horizontal distance of 24m from the boundary. But as Rule H13.6.2 (HiRB) would apply ($8.5\text{m} + 45^\circ$), a 26m tall building would need to be located at least 17.5m back from the common boundary. Relative to the standard Mixed Use zone, this provides for the same heights and setbacks up to 18m height, but then provides, from at least 9.5m boundary setback, additional height up to 26m at a 1:1 height to distance-from-boundary (and then 28m height @ 24m setback). This in conjunction with the underlying consent requirement for new buildings would manage visual dominance effects on the reserve, especially because unlike private property the presence of buildings, windows and overlooking of public space is a positive urban design effect in terms of passive surveillance and activation. However, it would result in more day-time shading of the reserve including in the winter time than would be the case from an 18m tall building (which would need to be set back approximately 4.75m from the boundary). In summary:
 - i. The existing Light Industry zone provides for permitted activity buildings 9.5m high 5m set back from the boundary, rising to 20m height @ 20m setback.
 - ii. The Mixed Use zone (18m height limit) provides for restricted discretionary activity buildings 8.5m high at the boundary, rising to 18m @ 9.5m setback. At the Light Industry zone 5m side yard setback, buildings could be 13.5m tall, or 4m taller than the Light industry zone provides for.
 - iii. The additional height sought would provide for restricted discretionary activity buildings 8.5m high at the boundary rising to 18m @ 9.5m setback. At the Light Industry zone 5m side yard setback, buildings could be 13.5m tall, or 4m taller than the Light industry zone provides for. From the 9.5m setback line, height could rise to 26m at a minimum distance of 17.5m from the boundary, and then up to 28m at a minimum setback of 24m.

- b. I consider that the additional shading effects of the proposal relative to the standard Mixed Use zone would be less than minor, but when compared against the existing Light Industry zone would be slightly more than minor on the overall utility and amenity of the reserve. These effects would still be appropriate in my opinion because the reserve is substantial and most of it would be clear of any such shadows, and that users of playing fields will be focused on active recreation rather than, for example, sitting enjoying the sunlight while reading a book. But the most important justifications for the additional height come in the form of building design quality (due to the Mixed Use zone consent requirement for new buildings), and the opportunity to maximise passive surveillance and outlook over the park that provides an amenity and safety benefit for park users that offsets or balances the additional shadows sought. Given that the general AUP: OP approach to development within the Mixed Use zone relative to parks appears to emphasise visual amenity, activation and passive surveillance ahead of minimising building bulk and shadowing (such as by having a generous HiRB plane and no yard setback, in the same way that street edges are treated), I have concluded that urban design priority should be given to securing the visual amenity, activation and passive surveillance benefits that are available in terms of the s.32 RMA “most appropriate” test for evaluating alternative options.
- c. For completeness, for additional shading effects to fall to a less than minor level, I consider that the adoption of a tiered height setback approach as has been proposed along Ormiston Road and Te Irirangi Road frontages would be necessary. This would be 20m height at the boundary, then 26m @ 24m setback, and 28m @ a further 24m setback. Although I do not consider it necessary, I would nonetheless still support such an outcome.

7.8 In terms of the **wider environment**, my analysis is that the additional height sought would have adverse urban design effects that are less than minor and appropriate for the following reasons:

- a. Significant separation distance will mean viewers will be looking at a wider townscape composed of a variety of land use zones, building scales and types.
- b. The overall flatness of the land means that for almost all occupants and users of public space, buildings and trees close by will in almost all cases screen the majority of buildings set further back.
- c. The foothills that rise to Redoubt Road to the south are approximately 2km away from the site; at that distance, buildings on the subject site will appear tiny and contribute immaterially to the views that will be available of the basin and towards the Auckland CBD.

8. what of the options best responds to the site's urban design context and characteristics?

- 8.1 In light of the above analysis I have considered which of the three options (Light Industry, Mixed Use (standard), or Mixed Use (additional height)) would best respond to the site's context and urban design characteristics.
- 8.2 In my opinion, the Mixed Use (additional height) is the superior option. My reasons for this are that:
- a. Although the loss of Light Industrial land may have an economic effect on the city, it is not an urban design effect that I can identify or factor into my analysis of urban design merit.
 - b. The Light Industry zone is simply not designed to promote high quality built form outcomes, and sets an extremely low bar for buildings through the lack of design recognition within the zone policies and permitted activity status for low-quality outcomes. It is the least successful option and is not likely to reliably contribute any positive amenity characteristics to Rongomai Park, the intersection / potential 'gateway' of Te Irirangi Drive and Ormiston Road, or the Botany Junction Local Centre.
 - c. Either of the Mixed Use zone options provide substantial positive benefits over the Light Industry zone option relating to likely built form quality, the zone policy emphasis on quality design outcomes and urban design issues, and the need for all new buildings to obtain resource consent.
 - d. The Mixed Use (additional height) option has been demonstrated to be able to accommodate the additional height without resulting in problematic environmental effects. But the additional GFA signalled as generally appropriate therein would provide for a material increase in the quantity of site occupants (in reality, apartment dwellers) able to walk or cycle to local shops, jobs, schools, and bus services. As such, it is the more efficient response to the wide variety of destinations that are within walking distance of the site.
 - e. The Mixed Use zone is likely to provide for high density housing which is in my view considerably more appropriate abutting Rongomai Park than a Light Industrial activity.
 - f. The Mixed Use zone is in my view more compatible with the scale of development and land use outcomes sought within the Mixed Use, Local Centre, Terraced Housing and Apartment Buildings, Mixed Housing Urban and Open Space: Sport and Active Recreation zones that are all adjacent to and visible from the subject site. The Mixed Use (additional height) option is slightly less successful than the Mixed Use (standard)

option relative to the southern Rongomai Park interface due to a reduction in sun and daylight.

- g. The Mixed Use zone options would successfully interface with the Ormiston Road / Te Irirangi Drive intersection environment and could help to bring a desirable 'balance' to what is currently a wide-open, traffic dominated and low-quality intersection.
- h. The Mixed Use (additional height) option is the one that would provide the highest possible catchment of people within walking distance of the Botany Junction Local Centre. This is relevant in the short-to-medium term given the low probability that the Single House zone / Mixed Housing Suburban-esque development within the centre's existing Terraced Housing and Apartment Zone will be redeveloped to the scale and densities enabled by the actual zoning of the land.

- 8.3 In my overall opinion the proposal is a logical and appropriate zoning for the land, and is likely to result in numerous, potentially substantial, positive urban design effects related to the requirement that all new buildings in the Mixed Use zone obtain resource consent including on matters of urban design, and the zone's enablement of high-density pedestrian-orientated development.

9. what of the options best responds to the AUP: OP's strategic planning framework?

- 9.1 Following on from the above, I have considered the three options in terms of the urban design-related aspects of the AUP: OP. In this respect, I have considered the respective zone options as methods to implement the objectives and policies of the RPS section (chapter B2) of the Plan.
- 9.2 In my opinion, the Mixed Use (standard) option presents the simplest fit with the existing framework, but when environmental outcomes as well as administrative 'fit' are considered, the Mixed Use (additional height) becomes in my view the superior option. My reasons for this are:
- a. The Mixed Use (additional height option) would best contribute directly to a quality compact urban form, including by way of a high-quality built environment, the most efficient possible use of the land and infrastructure (including passenger transport, open space and pedestrian / cycle infrastructure in the locality).
 - b. Reduced environmental effects when considered against the built form outcomes currently provided for by the Light Industry zone, and especially in terms of providing more households with the means to reduce motor vehicle use for local trips.

- c. Greater social and cultural vitality anchored around more people living close to the Botany Junction Local Centre, and giving it more ability to be a focal point for the local residential population.
 - d. The Mixed Use (additional height) option provides a compatible and appropriate “fit” with adjacent zones and the Local Centre, including promoting intensification around an existing centre and close to public transport.
 - e. Although a matter of the Mixed Use zone itself, it is noted that the zone already provides an additional height overlay that is linked to the building height rule at H13.6.2. This appears to provide for the additional height sought without requiring creation of any fundamentally new policies or methods within the AUP: OP.
 - f. In terms of AUP: OP Appendix 1, notably 1.4.4, 1.4.5, and 1.4.6, I consider that the proposal readily satisfies those matters. The site is small and has already been subdivided, and hence the proposal is effectively already its own ‘structure plan’ including the provision of land use types, block sizes, built form outcomes and heights, and road / transport infrastructure. I do not consider that further design validation is required to demonstrate the proposal’s superiority to the current Light Industry zoning.
 - g. It is most common in the AUP: OP zoning framework to have Residential, Centre or Mixed Use zones adjoining large reserves rather than Light Industrial zones.
- 9.3 Overall, I consider the Mixed Use (additional height) option to be one that presents very few urban design downsides. It would provide for superior built form outcomes, and a scale and density of development more likely to reinforce the Local Centre, local parks and schools, and the bus service than the existing Light Industry zone. I consider that the proposal will sit comfortably within the AUP: OP’s strategic planning framework for urban development and growth.

10. comments on Council staff review

- 10.1 I have been provided with a copy of an e-mail provided by Council staff to the applicant detailing preliminary feedback on the proposed Plan Change request. Relative to urban design, the following suggestions have been provided, with my advice below each suggestion in *italic font*:
- a. Masterplan indicating internal street layout, building footprints and relationship to street.

I do not oppose the use of master plans, but note they are time consuming and costly to produce, and if not based on what is actually sought to be developed can be misleading. In this instance, I do not

consider it is usual or necessary to provide a master plan for such a small, flat and already-urban-zoned site. The Council does not as a matter of standard RMA process include master plans in its structure plans or plan change requests, and in this instance the site has already been subdivided and an internal road has been formed.

If the site were larger, and in particular if the site was a Future Urban or Rural zoned land where no pattern of blocks, intersections or land uses had been established, then I would agree that a master plan should be undertaken. I also take comfort from the fact that, unlike the existing Light Industry zone, there is no realistic permitted activity outcomes that could occur in the Mixed Use zone; resource consents that allow the Council to consider the composition and layout of new buildings would apply and allow any inappropriate environmental effects to be managed at that stage.

My recommendation is that it is possible to understand the enablements of the proposed Mixed Use zone and compare them to the existing enablements of the Light Industry zone without a master plan.

- b. Likely relationship to Te Irirangi Drive/ Ormiston Road – i.e. fronts/back and points of entry into site.

In my opinion this matter is relatively self-explanatory. No new vehicle access points are understood to be possible, with all vehicle access to be derived from Florence Carter Avenue. However all of the street frontages around and within the site should only be regarded as 'fronts'. In terms of site frontages, it is noted that the site is already zoned for Light Industry activity where as a permitted activity the entirety of the frontages could be treated as a 'back'. The likelihood of the same occurring in the Mixed Use zone given the consent requirements and in particular policies that focus on quality streetscapes is in my view very low, and no different to any other Mixed Use zoned land in the city.

In my opinion land use frontage to Ormiston Road and Te Irirangi Roads is very likely, because commercial premises would seek visual exposure to passing traffic in the hope of enticing visitors into the sites via Florence Carter Avenue. To take advantage of the additional building height sought, apartment-living would be the obvious candidate. Ormiston Road presents an opportunity for a relatively deep outlook area, including the strip of bush diagonally opposite the site, and north-facing solar access. Te Irirangi Road also offers a wider outlook, the amenity of the rows of street trees along its centre (as they grow more), and a visual connection with the Local Centre.

Pedestrian and cycle access from Ormiston and Te Irirangi roads is very probable, because there are obvious desire lines from the site to bus stops and the Local Centre nearby, as well as Rongomai Park. In my view the likelihood of poor-quality pedestrian and cycle access points

occurring is sufficiently low that there is no need to impose what would be novel / one-off requirements for the site through the Plan Change.

I recommend that no further action be taken in respect of this matter.

- c. Indication of building heights both in 2D and 3D to give impression of bulk in relation to immediate and wider context, particularly in relation to existing development on the other corners of the intersection/opposite side of the major roads and the relationship to open space.

I am familiar with numerous Plan Changes where such modelling has been provided. In my opinion it is difficult to undertake this in a useful way without a specific master plan or development proposal to model. Modelling a generic bulk and location envelope is not useful as it does not represent a realistic development form, and similarly generic building bulk representations can be dismissed as being non-representative.

The difference in building height sought (8m max), at substantial horizontal setbacks from the boundary, is in my view not sufficiently different to what could already occur on the site as 20m high permitted activity buildings as to require a substantial set of bulk and location modelling. The AUP: OP already provides for substantial bulk and mass on the site, and as noted earlier in this report the opportunity through the Mixed Use zone to require land use consent to be obtained for every new building will in all likelihood result in a net improvement in built form quality and amenity values than is currently the case.

I recommend that no further action be taken.

- d. Visual assessment report of additional height.

In my opinion this is a fairly standard request and is not unusual where additional height is sought. In my report above I have provided an analysis of the proposal's likely urban design effects including from the additional height sought. However, a specific visual impact assessment ("VIA") takes into account a wider range of landscape architectural values and perceptual factors than a standard urban design assessment (which focuses on the more mechanical effects of development on public spaces) and to that end if one is prepared I recommend it be by an NZILA registered Land Scape Architect familiar with the NZILA guidelines for undertaking such analyses.

- e. Underlying hydrology would also be helpful.

I disagree that this is a relevant urban design request. The site is zoned Light Industry and has already been subject to subdivision such that it could be developed into a permitted activity industrial park with bulky buildings up to 20m tall and with no design oversight.

I am not clear what this information would be sought for unless there was a question mark over whether the site contained any watercourses that could be subject to protection, trigger riparian yards, and which could influence an eventual built form outcome. My understanding is that no such watercourses exist.

I recommend that no further action be taken.

11. conclusions

- 11.1 This report has documented an independent analysis of an application for a Private Plan Change made by JKGL Group Ltd on a 9.34ha site at 1, 3, 5, 7, 10 & 12 Florence Carter Avenue, Flat Bush. The site is currently zoned Business - Light Industry and is proposed to be changed to Business - Mixed Use. The application has been made to Auckland Council under the Resource Management Act 1991 (“RMA”) in terms of the provisions of the Auckland Unitary Plan (Operative in Part) “**AUP: OP**”. The key conclusions of this report are that:
- a. The existing zoning enables built form of a low-to-modest quality and is unlikely to respond ideally to the site’s context and urban design opportunities, specifically the local centre and residential zones adjacent to the site; the large public open space abutting the site to the immediate south; and the width and scale of both Ormiston and Te Irirangi Roads. The Mixed Use zone is more likely to result in development that positively responds to those characteristics and contributes to a high-quality urban node around this major transport junction.
 - b. The site’s previous subdivision and approved resource consents have established a framework of lots which are of dimensions and orientations that lend themselves to workable and well-laid out Mixed Use building footprints.
 - c. The loss of 9.34ha of Light Industry-zoned land in this part of Auckland will not give rise to any urban design effects of concern, and overall the change to Mixed Use zone is considered a considerably more efficient use of land within walkable access of a Local Centre zone and schools, and along major passenger transport routes. The change is also very likely to result in much-improved built form outcomes compared with the existing Light Industry zone.
 - d. The proposed additional height overlay, for buildings up to 28m tall, has been located logically within the site and well away from any external boundary. The overall flatness of Flat Bush means that the additional height will likely be screened from the immediate environment by buildings along the site’s frontage within the zone height limit, and will not be prominent or block any existing views from within the wider environment.

- e. The existing Mixed Use zone methods (including the additional height overlay) will be sufficient to manage the built form urban design effects of development on the land.
 - f. No additional Plan methods are required to manage the interface along the site's western boundary with the existing Light Industry zone at 2, 4, 6 and 8 Florence Carter Avenue because that land is within the control of the JKGL Ltd and has already been consented by the Council for a supermarket / department store (2, 4 and 6 Florence Carter Avenue) and a trade supplies outlet (8 Florence Carter Avenue). The proposed Mixed Use zoning will not negatively impact these activities (and in the case of the supermarket and department store are likely to support them).
- 11.2 The Private Plan Change could be approved on urban design grounds subject to the recommendations outlined in this report.