

Memorandum

24th March 2021

Memo to : Aaron Grey

Memo From : Nick Rae

Re: Park Green Plan Change - RFI

I have received and reviewed Attachment 3 to the further information request issued by Auckland Council on the 28th January 2021.

I note that as a result of the RFI and further considerations Civilplan have proposed adjustments to the proposed precinct provisions. The current version that this response refers to is dated 22 March 2021. I have been in discussions with Civilplan and a number of iterations have occurred.

The responses made below have taken these adjustments into consideration.

Attachment 3 is a RFI prepared by Matt Riley, and the following responds to the items as listed within.

1. Site and Context Analysis

Please refer to Attachment A which provides more information on the key elements of the location to enable a better understanding of the area. The second page includes identification of opportunities and constraints.

2. Operative Precinct Map

This will be provided separately by Civilplan.

3. Shared path through to the coast

Drawing PC03 in Attachment A identifies the location of the separated cycleways (which are two way on one side of the street) and the 3m shared path network. The recommended cycleway along Park Green Avenue is illustrated in red connecting to the southern coast. There is no reason why this path should not be included on the precinct plan and the current version includes this.

To add to this picture, NZTA is proposing a cycleway along the edge of the motorway as part of the extension to the recent work at Takanini. This will have connections to the development area and the precinct plan includes suggested possible connection points, but are yet to be confirmed. This will also involve the confirmation for options to connect over the Drury Creek at the south eastern corner of the site. The connections

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within the site will then be determined to confirm the circulation pattern along the eastern part of the site.

The bus route agreed with Auckland Transport is also illustrated on this plan, with an interim loop and a longer term connection to the north when that land is developed and connections are available.

4. Zoning Pattern – extent and position of

The area referred to is north of the neighbourhood centre and yes, the rezoning was limited by the applicant to their land holding south of Park Estate Road.

Refer to the analysis prepared by Civilplan in response to the clause 23 request.

A key consideration of zoning is that there is consistency with the AUP strategy. I note that since making the suggestion about the THAB zone potential, I have been advised by Civilplan that the AUP provides for the THAB zone predominately around metropolitan, town and local centres and the public transport network to support the highest levels of intensification. The zone for the centre at this location is 'Neighbourhood Centre' and therefore is not included in the above expectation and therefore provides less support for the THAB zone around it.

Refer to Civilplan response to items 20 and 21.

5. Activities A2 and A3

The RFI raises three questions regarding the proposal to allow building coverage of 50% regardless of site size, they are:

- Why is the change proposed?
- Why is the change appropriate?
- What are the environmental/ built form effects from this change?

The change proposed as A2 and A3 is part of a suite of changes that are linked.

Civilplan have adjusted the activity table which affect the previous (A2) and (A3) since lodged – refer to the adjusted provisions (22/3/2021).

The table as lodged provided for up to three dwellings per site where the site area is less than 400m² in both the MHS zone and the MHU zone as a permitted activity subject to compliance with the listed standards. The listed standards include the proposed greater maximum impervious areas and greater building coverage.

These greater coverage provisions are currently enabled through an assessment of the quality of the proposed design particularly with regard to the way the development addresses public open spaces and streets, but also with regard to the onsite quality of dwellings and their outdoor space. In effect, the higher coverage provisions are a carrot to achieve better outcomes and/or to ensure suitable living spaces for higher density development.

There is a concern that these outcomes will not result through the proposed permitted activity for the use of the higher coverage.

This concern has been considered and CivilPlan have made adjustments to the precinct provisions including changes to the activity table resulting in the following outcome.

(A3) is now proposed to provide for activities including two or three dwellings on a site less than 400m² in the MHS zone that do not comply with the zone standards for impervious coverage, building coverage or landscaped area with a Restricted Discretionary activity status. This means it would apply to a proposal where the coverages are higher than those standards, and/or with lower landscaped area. I understand that a minimum of one non-compliance triggers this status.

For the above activity, the assessment criteria listed at I444.8.2(1) and (2) (applying to the different zones) is required to be addressed and includes reference to the higher coverage standards proposed within the precinct, along with the other matters of outlook space, daylight, outdoor living space, fencing. This retains the similar requirements for higher density development as per the existing IRD (precinct version). This change also addresses the issue where assessment was required against the MHS zone criteria even if the site was in the MHU zone.

New (A5)

(A5) is now proposed to provide for one dwelling on a front site which is less than 400m² in the MHU zone as a permitted activity compliant with the listed standards, which include the greater maximum impervious areas and building coverage and the new HIRB standard I444.6.1.5 which provides for the AHIRB standard.

To use the AHIRB as a permitted activity, it requires compliance with the remainder of that standard, which has been developed by effectively moving the assessment criteria into this standard.

This requires sun access to outdoor living space, glazing to the front facade of each building, landscaped area for 50% of the front yard, provide a front door visible from the street, clear pedestrian access, and the set back of garage doors. It also includes control around where balconies or decks are located to avoid these alongside boundaries where privacy and overlooking issues could arise.

It also restricts glazing to elevations along side boundaries to either high level or opaque where they are located outside the standard HIRB recession plane. This assumes that there will be compliance with the AHIRB standard and requires a solution that does not set up a situation where privacy issues could arise when designing using the AHIRB.

This proposal is to enable single dwellings on vacant lots (less than 400m²) to utilize the higher coverage opportunities. This is also a carrot to encourage people to develop lots in a way that includes some of the key elements for how dwelling should address streets, which supports good urban design principles. This is different from the existing where only multiple dwellings on a site could use the higher coverage provision, however in effect this proposal relates to the same density.

The modelling we have done illustrates that additional building coverage may not have any effect on the way the development on a site interacts with the street. Image 1 below illustrates a complying building envelope on Lot 21 in Stage 1A of Park Green assuming the land is zoned MHU. The envelope is located at the minimum front yard setback, has 1m side yards, complies with the 3m + 45° HIRB and shows the difference between 40%, 45% and 50% building coverage. This is one example of where buildings could exist on the site, and illustrates that the increased building coverage will have limited to no effect on the streetscape.

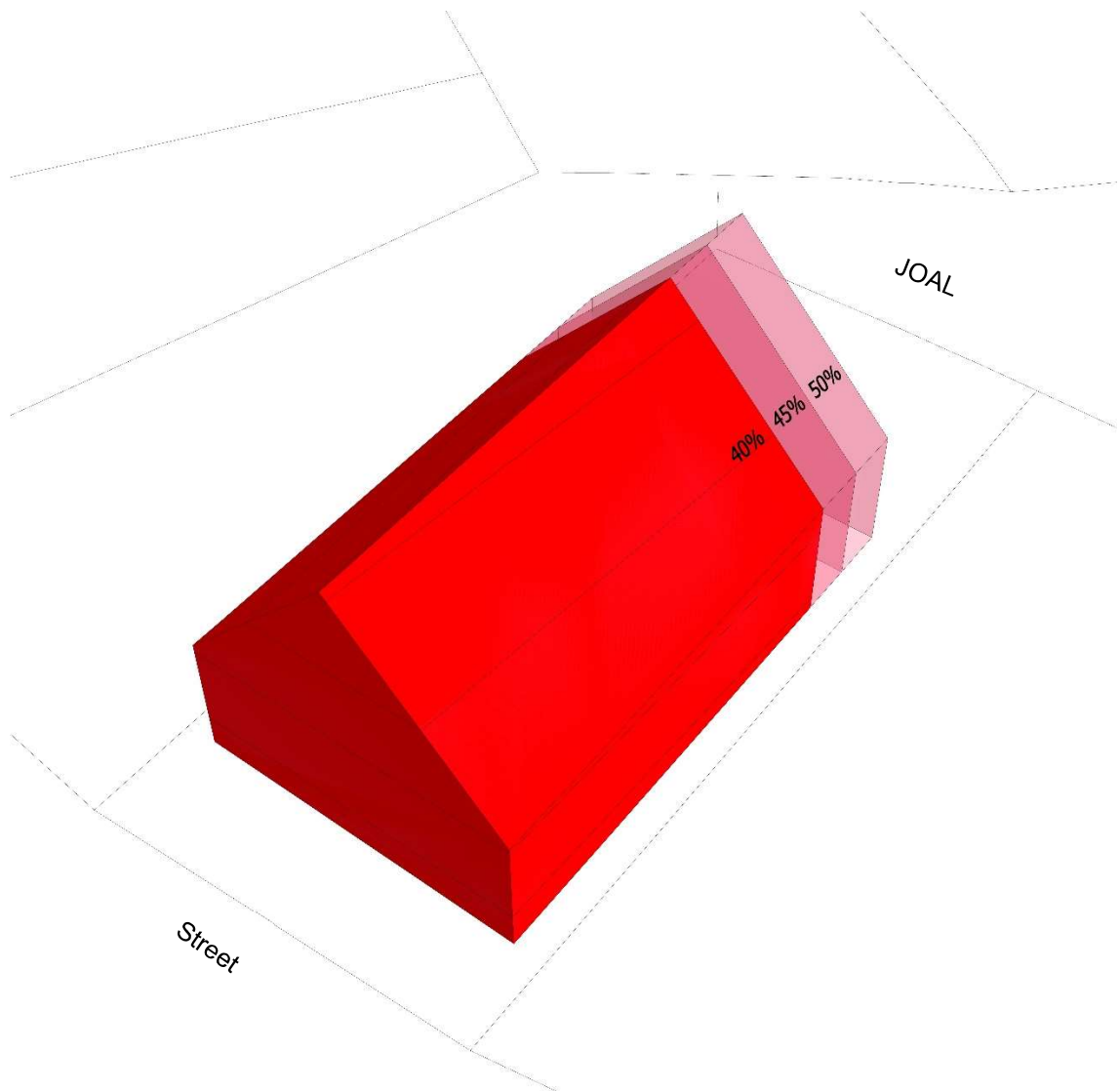


Image 1 – Comparison of building coverage on Lot 21

This is providing more opportunities for dwellings on a site in terms of their size which can provide for larger families, however it is not providing for greater density.

(A5) will encourage people to develop sites with the important interface elements required as they are not onerous and easy to achieve. As a permitted activity, the outcome is more likely to be a reasonable response to the street, rather than if there was no precinct and development would need to comply with the zone standards. The zone standards do not include requirements for building design, but do require landscaping in the front yard and compliance with the fencing standard for front boundaries.

The (A5) proposal is more relaxed than the existing precinct standards particularly with regard to the proportion of garage doors to the street façade. Currently the precinct requires that garage doors are no larger than 45% of the width of the building front façade. The AUPHP removed this requirement from the zones and the request is to align the Hingaia 1 precinct more with the expectations for the zones. This is not necessarily the best outcome from an urban design perspective but as it is not required in other zones, it is difficult to justify why this area needs to be any different.

The alternative is to develop a site compliant with the MHU zone (A3) "Up to three dwellings per site" requiring compliance with the zone standards and lower coverages than the precinct enable. The removal of the "dwellings fronting the street" standards in the precinct could result in a poorer outcome than currently required, however this outcome is considered acceptable elsewhere in Auckland due to its removal from the zones. It does allow more flexibility to provide a double width garage on a narrower site, and the scale of the rest of the building could be such (enabled by the MHU zone and use of AHIRB) that the garage door is not the dominant element. However, there is nothing stopping the garage door to be the dominant element with say a single level dwelling.

By promoting narrower sites, there could be a greater yield and a greater range of site sizes which is a positive outcome.

Integrated residential development

The precinct includes a different definition for IRD's than the definition in the AUP, requiring sites to be a minimum of 800m², rather than 2,000m² (AUP) and there is a lack of clarity. The precinct definition is not even in the definitions section of the precinct. The IRD provision in the precinct is proposed to be removed.

The MHU zone provides for IRDs as RD activities where they must comply with the listed standards. The minimum site size for this activity is 2,000m² as per the definition in the AUP.

Currently, the precinct takes this further and says IRD's on front sites are RD activities, but does not list any standards that need to be complied with. As this is provided for in the Precinct, one would assume that the definition in the precinct would also apply to this activity, which requires a site to be a minimum of 800m².

It is unclear whether the precinct overrides the zone in this case, but suggests it does as activity status is the same for two different activities but the precinct is more permissible in terms of the minimum site area:

- a) The zone IRD's which need to be on sites at least 2,000m² and comply with the standards, or
- b) The precinct IRD's which need to be on sites at least 800m² and no standards are required to be complied with.

The precinct is not consistent with the residential zones structure where IRD's are provided for as RD activities and standards listed are to be complied with.

For the Single House zone, Rural and Coastal Settlement zone and Large Lot zone, IRD's are provided for as Discretionary activities and no standards are listed to be complied with as an alternative.

The definition in the precinct suggests that there are standards that need to be complied with as it states that the height in relation to boundary standard does not apply to internal boundaries for example. Also, some of the development controls refer to IRD's which suggest these also apply.

It is possible that both the precinct activity and the zone activity apply where the precinct provides for more opportunities due to the smaller site requirements to comply, but limit IRDs only to front sites?

The proposal is to remove the additional IRD activity from within the precinct so only one definition applies and simplifies this issue. Any IRD proposal will need to comply with 2,000m² site minimum.

This raises the issue of avoiding losing the current development opportunities provided for by the precinct IRD provisions. The main advantage is that the precinct allows for a higher building and site coverage for IRD's than the underlying zones. At 6.31.4.1 IRD's can have up to 70% impervious coverage, 50% building coverage and a minimum of 30% landscaping of which at least 10% must be planted including a tree, and 40% of the front yard must be landscaped area. This overrides any of the underlying zones.

In comparison the following table sets out the underlying zone provisions:

MHS zone		MHU zone	
standard		Standard	
H4.6.8	60%, max. imp cover	H5.6.9	60%, max. imp cover
H4.6.9	40% max building cover	H5.6.10	45% max building cover
H4.6.10	40% min LS (50% of front yard)	H5.6.11	35% min LS (50% of front yard)

This results in 10% more impervious cover provided for by the precinct, 10% more building coverage in the MHS areas and 5% more building coverage in the MHU areas. Then 10% and 5% less landscaping than the MHS and MHU zones respectively.

The general strategy in the AUP residential zones is that with greater density, there is also greater building and impervious coverage. This has been reflected in the precinct by providing for greater coverage for higher density development and that is a density greater than 1:400.

Currently, an IRD could be two dwellings on an 801m² site, therefore a density of 1:400.5 and 50% building coverage (plus the other coverage differences) for each. To achieve this, a consent is required.

There are issues with assessing IRD's (regardless of the underlying zone), as they are required to be assessed against the criteria listed in the MHS zone for "four or more dwellings". Therefore, if the site is in the MHU zone, the assessment needs to be undertaken using the MHS zone criteria. This makes no sense.

The criteria are essentially the same in both zones for "four or more dwellings" in terms of the matters of interest, however the details are different as they relate back to whether or not the proposal achieves the purpose of the listed standards or what alternatives are provided resulting in the same or better outcome. This does not necessarily achieve the objectives and policies of the MHU zone, or align with the opportunities provided.

For example, let us consider building coverage. The purpose at H4.6.9 (MHS) states "**to manage the extent of buildings on a site to achieve the planned suburban built character of buildings.**" The method to achieve this as set out in this standard is that no more than 40% of the site shall be occupied by buildings. Then one needs to grapple with an assessment to prove that the provided 50% building coverage results in the same or better outcome than 40% building coverage. The outcome depends on where the 40% and 50% might be located on a site and where it is experienced from. This applies also to land zoned MHU. It does not direct one to assess against the MHU criteria which as above has higher coverage limits.

Apply this same methodology to the other criteria and it becomes a very problematic assessment and does not encourage people to use these provisions, even though policy 3 in the precinct requires higher density to be enabled between lower density vacant lots to ensure a choice of living environments and affordability.

The easiest method to develop the land is to not use these IRD provisions, resulting in different or limited choices and more unaffordability primarily due to more land being required per dwelling.

The MHU and MHS zones enable three dwellings per site complying with the listed standards as permitted activities. No assessment is required and it is assumed that if the development complies with the standards – it will achieve the objectives and policies of the zone. There is no specification regarding site size, but the smaller the site, the smaller the dwellings.

So (A5) is providing a simpler way of enabling the currently intended opportunities and enable higher coverage on sites smaller than 400m² and not losing this opportunity through the proposed changes to the IRD provisions.

The proposed change also enables the higher coverage to be utilised for development of two or three dwellings on a site less than 400m² proposed now as an RD activity. It lists the standards to be complied with, and the coverages need to be more than the zone standards. The assessment criteria then require consideration against the higher density coverage standards.

I understand that the concern raised by Mr Riley is that currently there is the ability to assess the quality of the proposed outcome and require certain outcomes through the other assessment criteria that deal with aspects such as the extent to which:

- the development contributes to a variety of housing types;
- development achieves attractive and safe streets and public open space;
- Height and bulk maintains a reasonable standard of sun access and privacy to adjoining sites and minimises visual dominance;
- Provide good on site design for access to sunlight, ventilation, outdoor space;
- there is capacity to service it.

These matters are not required to be assessed for up to three dwellings per site in each of the zones using the standard coverage maximums where the same issues could result depending on where the building coverage is located. In my view, it is not the coverage that could result in less than ideal outcomes, it is how the dwellings are designed.

I consider that the changes made address this concern by maintaining assessment for two or more buildings with higher coverages, and specific standards for one dwelling.

The capacity to service higher coverages is already provided for through the SMP allowing for 70% impervious coverage for approximately half of the area and the remaining subject to 60% (due to the assumption that not all sites will utilise the higher density provisions), and three dwellings per site in terms of other services being installed.

I support requiring assessment to achieve good outcomes, however the way the precinct is currently structured does not encourage developers to utilise these due to uncertainty, cost and time.

6. Permitted activity status for use of Alternative HIRB

Turning to the matter of the AHIRB, there is also concerns about losing control over design aspects, it is considered that the changes made address this further with specific standards that work with the AHIRB standard. If a development does not achieve these standards, then it will require a consent. These are to ensure privacy to neighbours and how buildings address the street.

Sun Access

The RFI request asks for analysis to quantify the extent of effect on sunlight access using the AHIRB standard and specifically would, as a permitted activity, a reasonable standard of sunlight be achieved on an adjoining site?

We have developed a 3D model of part of the site at the north west corner of Stage 1a, where there are a range of lot sizes and orientation. The EPA plans for stage 1a (refer to SK01 for location) were utilized to build the site model (contours and subdivision layout) in Sketchup.

This is illustrated in Attachment B.

This includes a permitted bulk envelope and a possible complying building envelope taking into consideration the building coverage limitations for both the MHS zone and the MHU zone with the proposed precinct provisions. This is illustrated on drawing SK02 of Attachment B.

It is noted that building designs have not been attempted due to the variety of outcomes that could be possible. The building envelope is an example and not the only location for building form. Many different outcomes could result however the building form has been located at the front yard setback. This means that those fronting Park Estate Road have a southerly orientated rear yard and represents one of a number of worst case scenarios in terms of the possible sun access to outdoor living space.

Image 2 below provides an example of the difference between the possible bulk using the MHU HIRB and the AHIRB on Lot 21 and with 50% building coverage.

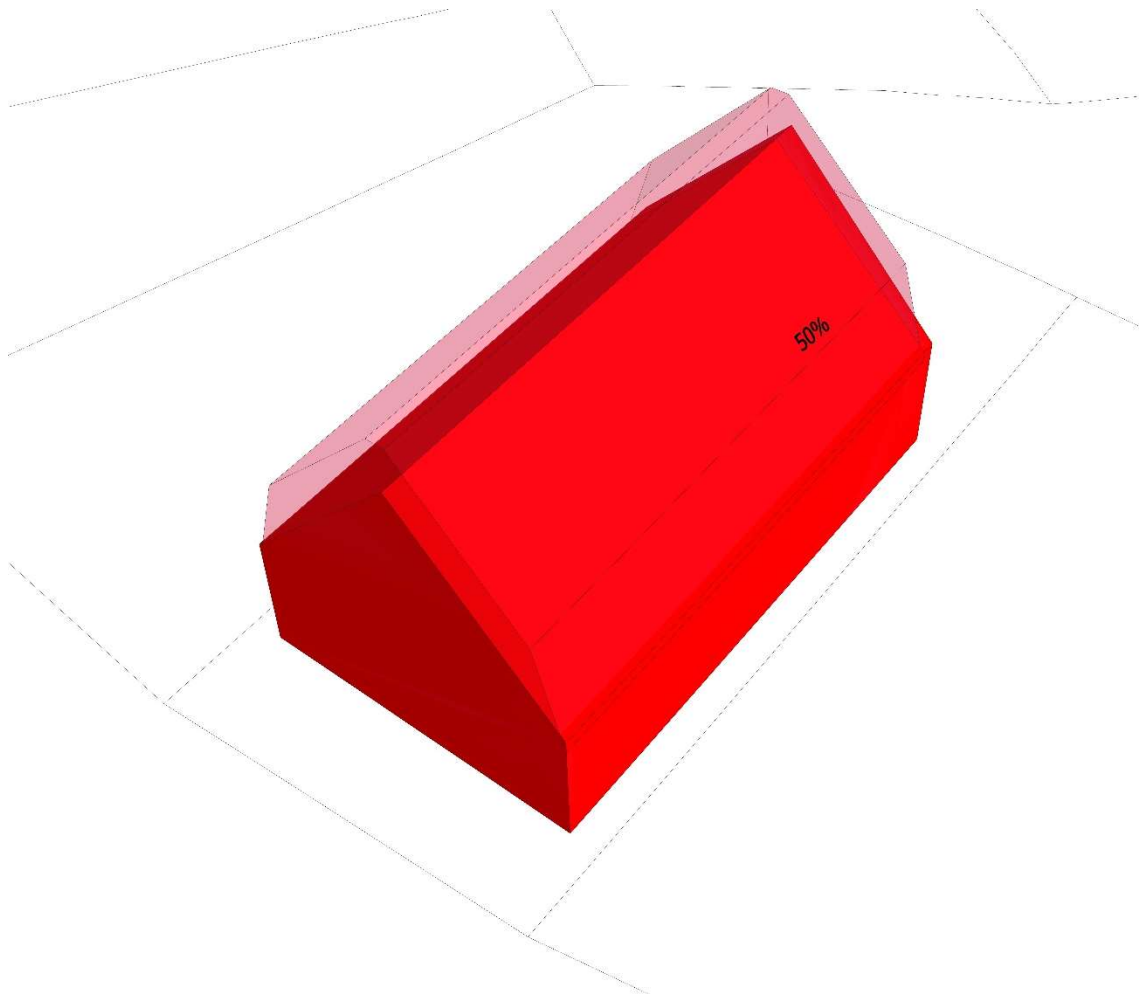


Image 2 – Lot 21 with 50% building coverage and comparison of MHU HIRB (red) and AHIRB (pink).

Drawing SK02 enables a comparison between the MHS zone and the MHU zone complying with the building coverage, yards, standard maximum height (without the additional height for roof projections), standard HIRB - refer models 1 and 2. The third column illustrates the MHU zone plus the AHIRB – refer model 3.

The green rectangles are 24m² (6x4m) representing an outdoor area, this is 4m² larger than the minimum but allows for compliance with 75% of that space rather than 100% of a 20m² space¹.

The comparison with the MHS zone is not that important if we consider the MHU zone is appropriate to be applied to this land. There is greater bulk provided for in the MHU zone and there is the potential that sun access to neighbouring sites will be further restricted due to the increased height and HIRB standard. The analysis is therefore concentrated on the comparison between the HIRB and the AHIRB for the MHU zone.

H5.8.2.(5) (MHU zone) sets out the criteria for assessing the impact of a building complying with the AHIRB as follows:

Whether sunlight access to the outdoor living space of an existing dwelling on a neighbouring site satisfies the following criterion:

- **Four hours of sunlight is retained between the hours of 9am – 4pm during the Equinox (22 September):**
 - (i) **over 75% of the existing outdoor living space where the area of the space is greater than the minimum required by Standard H5.6.4 [should be 14] which is 20m² for ground level: or**
 - (ii) **over 100% of existing outdoor living space where the area of this space is equal to or less than the minimum required by Standard H5.6.14, which we have used 20m²**

Drawing SK03 illustrates the sun access from 9am to 4pm for each of the three models at equinox and mid-winter.

Model 1 illustrates that the equinox all outdoor living spaces receive 100% sun between 9am and 4pm except for lots 14,15,17,19. For those four, parts of their outdoor space are in shadow for part of the day. All of these outdoor spaces could receive sun for at least 4 hrs per day.

Model 2 illustrates that the nominated outdoor living space of lots 18-19 is partly in shadow until around 11am. Not all of these spaces are in shadow for all of this period, rather the sun moves around.

Model 3 illustrates that there is less sun access due to the greater bulk as expected from the AHIRB. For the lots with their open space in a northerly location, (18 – 23) would all comply with a minimum of 4 hrs of sun. The exception is lot 19 which would have at least 75% of the space in sun for 4 hrs.

¹ H5.6.14., H4.6.13

For the lots fronting Park Estate Road (14 – 17) they would receive sun in their outdoor space for at least 2 hrs over 100% of the area, and at least 4hrs over 75% of their space.

If the outdoor space were located within the front of the site, it would easily comply. It is noted that H5.6.14(3) provides additional restrictions for south-facing OLS that have not been accounted for by the model, and there is still an expectation of compliance with that requirement.

This modelling confirms that development can occur in a way that complies with the expectation of sun access to sites.

If the building form were to be located to the rear of lots 14-17, the potential bulk would reduce as the AHIRB is restricted to the first 20m of the site. The standard HIRB would apply for the areas beyond this 20m.

This will reduce the potential sun access to neighbouring sites (if they abut) in the MHU compared with the MHS zones due to the 0.5m additional height at the boundary where the recession plane begins.

The proposed change to MHU zone will inherently result in the potential reduction of sun access to lots due to the higher HIRB standard being 3m+45° of the MHU zone versus 2.5m+45° for the MHS zone and the greater height limit of the MHU zone versus the MHS zone. This slightly higher building coverage could have an impact but this depends on where it is located.

This potential reduction in sun access has been accepted as an impact on development within the MHU zone across the city as a consequence of a slightly greater built form outcome.

The potential to use the AHIRB without further assessment will result in a further reduction in sun access but the model suggests that at least 4 hrs of sun can be achieved to 75% of an open space area bigger than 20m².

The benefit of encouraging the use of the AHIRB is that more people will likely use this provision as they will not need to apply for resource consent, but more importantly better enable the development to achieve the objective H5.2(2) which seeks an urban built character of predominantly three storey buildings.

The way the land can be and is being subdivided (with the minimum vacant lot size being 240m²) means that there are not many superblocks that would easily enable three storey buildings. The lot sizes would mean that it would be difficult to achieve a meaningful three level outcome.

The proposed standard addresses the issue of ensuring an amount of sunlight to an existing neighbouring outdoor space, especially where there is no existing dwelling or outdoor space adjacent.

This will still work on a first come first served basis, requiring the neighbour to design to the existing situation (including buildings that have obtained building consent) to ensure that design provides for sun light. The AHIRB modelling suggests this standard provides for sun access, however the design of the receiving environment is important.

The drafting of the standard may not be 100% yet and welcome further discussion on this, but I consider there is value and benefit in making the AHIRB provision more enabling and which might have a better mechanism for ensuring a suitable amount of sunlight to any neighbour.

I share Mr Riley's concern that there could be lots that are around 20m long or less, however I am unsure of the relevance of the relationship of the number of units on a site with regard to the site depth as Mr Riley discusses.

A change is proposed to I444.6.1.5(2) which adds a restriction such that the AHIRB can not be used within 6m of a rear boundary to address this issue to some degree to avoid the AHIRB from being used along rear boundaries.

For vacant lot subdivision the requirement is for an 8 x 15m rectangle to fit within the lot, clear of yards. This results in a minimum lot size of 10m x 18.5m in the MHU zone.

Privacy

The second question is whether the use of the AHIRB as a permitted activity would maintain a reasonable standard of privacy to the habitable rooms of a neighbour's dwelling and to their outdoor living space.

Again, this criterion assumes there is an existing dwelling on a neighbouring lot. If there is none then the criterion is redundant. It therefore does not protect privacy of a neighbouring lot. In this case, it is assumed that the design of the neighbouring lot will respond to the existing situation. This may or may not occur and particularly hard when neighbouring dwellings are being designed at similar times without any relationship in this process.

Development of permitted dwellings in the MHU zone has no specific controls with regard to privacy. The development envelope created by the standards for permitted activities are therefore the only controls that have some bearing on the potential for overlooking and therefore privacy. The height and setbacks at greater heights are deemed to provide sufficient privacy. In my opinion, this is not necessarily the case as there are many examples where windows of upper levels in dwellings are situated such that a direct view between upper level bedrooms of separate dwellings can occur, or can look down on the neighbours open space or into other lower level rooms.

In this case, the level of privacy is then determined by the occupants of each dwelling, who may plant trees in particular locations, put screens up, or add blinds or louvres to windows.

By allowing more bulk to be established at the upper levels closer to a neighbour's boundary there is the potential for windows to be located closer to those activities on the neighbouring site. If there is an existing building adjacent then one can design for, and others can assess the extent to which overlooking is minimised.

This favours the first to develop in a new subdivision, and a more equitable approach would be better. For permitted activities using the AHIRB standard, they are now required to restrict the size and location of windows in the second and third levels to say

high level windows or opaque. Ideally, the side walls of dwellings in close proximity to one another should have limited windows avoids balconies and decks being built along side boundaries to minimise privacy issues.

Visual Dominance

The third question is whether the permitted status of the AHIRB suitably minimises visual dominance effects.

It is interesting that the policy H5.3(4) includes reference to visual dominance effects, yet the assessment criteria at H5.8.2(5) does not, except for at H5.8.2(5)(c)(iv) where it is concerned about the effects of garage doors on the amenity of the street.

If the only reason for consent was a non-compliance with H5.6.5 (HIRB), but compliant with H5.6.6 (AHIRB), then visual dominance effects are not a matter for consideration under H5.8.1(5).

There are no expectations now for how dwellings should respond to a street for permitted activities other than the bulk and location standards. This is a short coming in the plan in my view as a result of the panel removing certain standards that addressed the key aspects of building design.

The assessment criteria reintroduce these aspects as some way of requiring a better outcome than what can be achieved through permitted activities with the carrot of enabling more bulk.

In my opinion, minimising the visual impact of garage doors can be achieved with greater bulk such that the size of the door becomes smaller relative to the scale of the dwelling. Greater bulk will help to achieve the scale of development expected in the MHU zone and that bulk would be considered positive.

I have no issue with the criteria and what they are trying to achieve (and should apply to all development). These could be more specific to achieve certain outcomes, rather than having to deal with words such as 'optimising front yard landscaping', as this is very subjective and very difficult to determine.

The proposed standard now requires achieving these attributes when using the AHIRB.

Further considerations.

Mr Riley helpfully records his thoughts and offers some suggestions.

His queries include the proposition of up to three dwellings on a site, rather than just one and how sun light access to these dwellings will be secured. The standard HIRB provides an expectation of a certain amount of sunlight to a neighbouring property regardless of whether there is one, two or three dwellings on or proposed on that neighbouring site. If these dwellings existed on a neighbouring site, then an assessment could be made as to ensuring sun while developing using the AHIRB.

The modelling suggests that a reasonable amount of sunlight to a neighbouring site can be achieved when using the AHIRB, assuming “reasonable” is defined as per H5.8.2(5)(a).

If one site is developed using the AHIRB, a neighbouring site can be designed in response to this.

I am confident that providing the AHIRB standard as a permitted activity will better provide for three level development and intensification on sites within Park Green. I consider the refinements made, cover the matters being raised.

7. Neighbourhood Centre zone – Residential at ground floor

This part of the plan change has been reconsidered and no longer seeking change.

8. Viewshafts

Mr Riley queries how the development will maximise coastal views as this is an aspect to support an increased density. The design of the subdivision is the main vehicle for achieving this. The assessment requires consideration as to “the extent to which viewshafts from roads and open spaces out to the coast are provided for” (I444.8.2(13)(h)) which is a new criterion in the precinct.

The topography has been retained where possible such that there is the upper plateau and lower areas. The competing aspects of road gradients, cut/fill balance (fill needed to raise levels above potential flood hazard) and desire for relatively flat sites all have had to be considered through the subdivision design process. Where possible the subdivision provides opportunities for views over other dwellings on lower land so that not only views to the coast are along roads or open space. Taller buildings will help in achieving this also.

Issues from Planning RFI

In addition to the urban design RFI, Civilplan has requested that we provide an opinion on item 27 of the planning RFI.

This relates to Theme 10: Coastal and Reserve Interface. The proposal establishes option 3 is the most appropriate option and has been used as the interface in an existing consent.

The proposal is to remove the existing standard 4.7 from the precinct and replace it with I444.6.1.4 Fences and Walls adjoining reserves.

When designing the subdivision referred to in the above mention consent, the interface with the coastal reserve was very important. The standard did not work as Council parks requires no retaining walls within 1.5m of a park boundary and the standard addressed walls adjoining the boundary and required them to have 0.6m of planting in front. It did

not address the fact that these interfaces are rear or side boundaries and therefore could have up to 2m high solid fences built along them.

The proposed standard (I444.6.1.4) was effectively developed through the previous consent process to ensure a suitable workable solution can be achieved. It also addresses other reserves such as drainage or open space reserves such as the streams and wetlands.

This change will avoid adding consent notices to titles and provide a simpler way of managing the interface. Is it recommended to be applied across the precinct.