
6 MAY 2025

**A & L SARGEANT
C/- TATTICO LTD
ATTN: TOM MORGAN
BY E-MAIL**

Dear A & L Sargeant

SUMMARY URBAN DESIGN ASSESSMENT – AMBRIDGE ROSE, 147-153 EDGEWATER DRIVE PAKURANGA

1. Thank you for asking me to provide an independent review of your project.
2. In undertaking this review I met several times with your design team and Tom Morgan of Tattico Ltd, your planner. I have visited the Site. I am familiar with the area of the proposal.
3. The information provided to me is:
 - a. A planning briefing by Mr. Morgan including that consent is required for the proposal as a restricted discretionary activity including on the basis that it is for an Integrated Residential Development, and that consent will be applied for on a fully notified basis;
 - b. Architectural plans prepared by Peddlethorp Architects Ltd., project ref. 2114, dated May 2025.
 - c. Landscape and Visual Effects Assessment undertaken by LA4 Ltd., project ref. 24334, dated April 2025.
 - d. Landscape plans prepared by Second Nature Ltd., project ref. 2397, dated April 2025.
 - e. Visual simulations prepared by Cadabra Ltd, dated April 2025.

Introduction

4. I am a qualified and experienced self-employed urban designer. I hold the academic qualifications of B.Plan (Hons); M.Plan (Hons); M.Arch [Urb Des]

(Hons); M.EnvLS (Hons); and M.EngSt [Transportation] (Hons). I am a full member of the NZPI and am a Registered Urban Designer.

5. I have extensive experience in intensification projects across the country and including Auckland. I routinely teach at the University of Auckland and am currently employed to teach urban design theory as part of the Master of Urban Design course.
6. I have previously provided professional services on this Site for a lesser-scaled retirement village expansion (2022-23).
7. Although this document has not been written as a statement of expert evidence I confirm that at all times in association with this work I have complied with the Environment Court's Code of Conduct for Expert Witnesses contained in its Practice Note 2023.
8. For the avoidance of any doubt, I declare that I have considered whether I might be subject to any conflict of interest and concluded that I am not.

Methodology and limitations

9. In undertaking my assessment I followed what I consider to be an orthodox urban design methodology based on the following general steps and in compliance with the UDIA Code of Ethics and Code of Practice. I refer to **Attachment 1**, which sets out a number of general limitations, and urban design references that have guided my approach. Of those, MfE's 2003 "*People+Places+Spaces*" the key New Zealand-based source.
10. In summary the key steps in my assessment were as follows:
 - a. I undertook a site visit of the neighbourhood. In this instance this included the small stub-peninsula of Edgewater Drive (south), Riverhills Avenue and Marriot Road (north), Ti Rakau Road bridge and Riverhills Park (east), and Reeves Road (west). A site and context analysis was undertaken including a briefing of the client's objectives for its projects; the physical environment; and planning relevant documents; then
 - b. Urban design principles derived from the authorities listed in **Attachment 1** of this report (best exemplified by MfE's 2003 *People+Places+Spaces*) were affirmed; then
 - c. Relevant urban design outcomes *for the proposal* were identified based on the Applicant's own vision, the relevant urban zones of the Auckland Unitary Plan as a guide, and the National Policy Statement on Urban Development 2022; then
 - d. For each of the matters identified in (c), the proposal's urban design effects and overall merits were reviewed in terms of the following:
 - i. What are the relevant outcomes proposed;
 - ii. Are those reasonable and acceptable in terms of preferred urban design outcomes;

- iii. Are those reasonable and acceptable in terms of the applicable AUP: OP and NPS: UD outcomes (H4 Mixed Housing Suburban zone and NPS: UD policy 3(c));
- iv. Where shortcomings and/or adverse effects have been identified (regardless of their scale or severity), are additional matters or changes to the proposal warranted and if so are those changes reasonable and proportionate to the scale of the identified shortcoming(s) and/or adverse effects(s)?
- e. Finally, evaluate the overall merit of the proposals across all of the identified topic areas and confirm support; support subject to additional matters or changes; or opposition to the proposal.

Summary of Key Findings

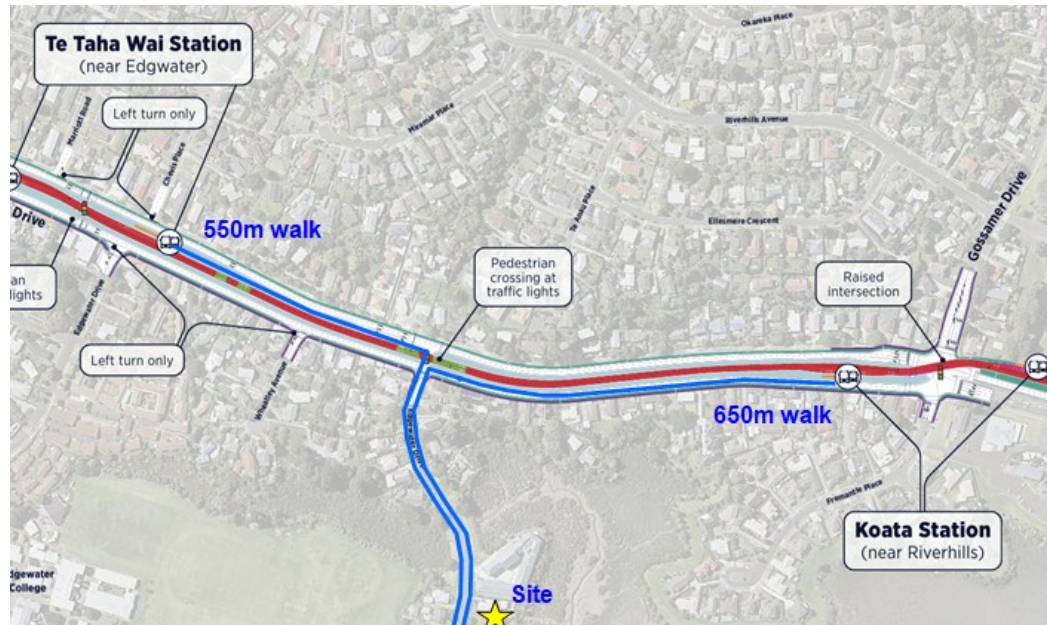
11. My key findings can be grouped in terms of the following:
 - a. The proposal.
 - b. Matters that are supported or otherwise of no urban design concern.
 - c. Matters of potential urban design concern.
 - d. Recommendations.

The proposal

12. The proposal is for 2 x 6-storey retirement village (IRD) buildings comprising 51 retirement dwellings, communal spaces, car parking, and landscaped grounds. The buildings would front Edgewater Drive forming a sequence of three buildings (including an existing 3-storey retirement village building) along the street. Behind the buildings is the coast (estuarine). Communal spaces have been generally positioned at the street front, to help enliven this as well as connect residents with the community.
13. The application is being made on a publicly notified basis noting that it seeks to align with the NPS: UD ahead of any PC78-type plan change to formally change the operative land use zone (Mixed Housing Suburban). I am advised that the NPS: UD is compulsory and that, although there has been public uncertainty regarding the MDRS-aspects of PC78, there have been no statements made by the Government suggesting the NPS: UD requirements may cease to apply. I am advised that policy 3(c) of the NPS: UD requires that within a walkable catchment of an existing or planned rapid transit stop, development heights of at least 6-storeys must be enabled.
14. The Site is a 650m walk (westbound) from the planned Koata Station, and a 550m walk (eastbound) from the planned Te Taha Wai Station. The topography is quite flat, the routes between the Site and the two planned stations is direct and obvious, and there are many opportunities to safely cross intervening roads. In my opinion there is no question that the Site is within a convenient walk of both of these planned stations, and that NPS: UD policy 3(c) applies in the first instance. I have summarised this in **Figure 1** (next page).

15. The buildings are proposed to incorporate a sandstone / brown group of tones, and both are proposed to be served by a single / shared principal pedestrian access to the street that then splits within the Site to each building entry.
16. Lastly, there is no permitted baseline relevant to my urban design assessment. I am advised by Tattico Ltd that consent is required as a restricted discretionary activity. Of note, the proposal does not comply with numerous zone standards including maximum building height, height in relation to boundary, maximum building coverage, and minimum landscaped area.

Figure 1 – Eastern Busway plan and stations (no scale)



Matters that are supported or otherwise of no urban design concern:

17. Except where set out in my list of potential urban design concerns and/or recommendations to manage potential urban design effects, I consider that the following are acceptable (or positive) outcomes, and will not generate or exacerbate / contribute to any concerning cumulative adverse urban design effects:
 - a. The Site is comfortably within a convenient walking distance of two planned RTN busway stations and I agree it is well suited for the scale of 6+ storey development required (to be enabled in District Plans) by the NPS: UD. There is nothing about the Site or its context that would override that planning direction.
 - b. Although the NPS: UD direction is more recent than the operative MHS zone, I am aware of numerous “over height” buildings within the MHS in various locations across Auckland that have been granted on the basis they were not fatally offensive to the AUP: OP policy framework. On that basis I assume that on a case-by-case basis something much greater than the zone standards may be acceptable.

- c. The high-level site planning is logical and agreed with, as is the provision of communal activities at the street-fronting ground floor as a means of activating that, and provision of car parking along the sides and rear of the buildings.
 - d. Although commented on later, I consider the single point of pedestrian entry to both buildings is workable, legible, and obvious. This includes the inclusion of a small canopy at the street entry attached to Building A.
 - e. The proposal complies with all yard setbacks and has been designed to comply with the operative MHS Alternative Height in Relation to Boundary standard; both are decisions I agree with.
 - f. The front yard will be generously landscaped and will not be visually dominated by vehicle access, garaging, or reverse manoeuvring.
 - g. The general design and visual appearance of the building is of a visually engaging quality, including a variety of surface planes, materials / finishes, and window positions. The top floor of each building, facing the street, includes recessed 'cut outs' at the street frontage to give the impression of the top floor receding back from the front face of the building. This is a commonly-used technique, as is the differentiation of the top floor in a darker and more recessive colour to help visually break-up the building scale.
 - h. Subject to comments later, I support the landscape plan concept including the intent to provide trees within the road reserve as well as the Site; this technique can provide a layering of trees to help screen views of buildings, as well as generally enhance the amenity of streets.
18. In respect of all of the above, the proposal is a logical response to its Site and context characteristics, and the outcomes sought by the AUP: OP in light of the NPS: UD.
19. I refer also to my recommendations, which do relate to several aspects of the above on the basis of avoiding, remedying or mitigating potential adverse urban design effects.

Matters of potential urban design concern

- a. Suburban built form character
 - i. It seems clear that the existing MHS zone and its "predominantly two storey" planned character cannot co-exist with the NPS: UD direction that development of at least 6-storeys must be enabled. I am advised that in this instance the NPS must prevail and that as a result the Council must change the MHS zone unless a relevant qualifying matter exists. In PC78, the Council has identified a proposed qualifying matter affecting part of the Site relating to coastal erosion, although the accuracy or other merits of that are unknown. This indicates that on at least the approximately 50% west-side of the Site (adjoining the street), a minimum of 6-storeys will need to be provided for.

- ii. In my opinion the proposal presents no built form character issues relative to the outcomes directed by the NPS: UD.
- iii. In terms of the operative MHS zone, the proposal is plainly not for 2-storey buildings or predominantly 2-storey buildings. The buildings are for predominantly 6-storey buildings, and this is a scale of high-density development normally expected in the THAB zone. However, as I read the MHS zone provisions they do not seek that 2-storey or predominantly 2-storey buildings must or is all that may occur on each site – 1-storey dwellings are permitted and there are many examples of more-than-2-storeys being shown to be appropriate, particularly in the case of IRDs such as have been proposed on sites larger than the typical single-allotment-developments that the zone standards focus on.
- iv. In this instance I consider “predominantly 2-storeys” applies to the area of the zone on the stub-peninsula defined by Edgewater Drive south-west of Ti Rakau Drive and the area of operative MHU zone. The effect of the proposal will be to maintain a predominantly 1-to-2-storey suburban built character in this area, noting an existing 3-storey retirement village at 14 Edgewater Drive and a mix of 1-and-2 storey buildings at Edgewater College. Most existing dwellings are 1-storey, although 2-storey dwellings are common. More recent developments, such as at Purakau Lane, are 2-storeys.
- v. My analysis of the proposal and locality is that although clearly not for 2-storey buildings, the proposal – especially beyond a distance of >150m from the Site (including because of the curvature of Edgewater Drive) – will not be visually dominant or sit higher than existing trees or vegetation. Although the tops of the buildings will be visible above many existing dwellings, the setback distance and screening provided by intervening buildings and trees will mitigate potential adverse character effects.
- vi. But in terms of the streetscape and properties within 150m of the Site, the proposal will be plainly visible and not consistent with the existing character of the neighbourhood. I do consider that the proposal does mitigate some of its character effects including by way of visual quality and variation in the building facades and the decision to propose two smaller and detached buildings instead of one larger (and likely more efficient to operate) building.
- vii. Overall, the suburban built form character of the Edgewater Drive MHS area will be maintained simply by virtue of its scale compared to that of the proposal, and that for much of the area (notably all of the western half of the Edgewater Road ‘loop’) the proposal will likely not be visible at all. But locally and especially within 150m of the Site, and exacerbated by the proposal sitting prominently on the key loop road that serves the area, the proposal will be very visually obvious and clearly ‘out of character’. This will result in adverse dominance effects. Based on my experience with residential intensification generally, and how consistent the existing suburban character of the area is, I consider that the change proposed to the existing character of the area would be adverse and at least minor.

b. Building height effects

- i. Separate from built character effects, the proposed height will have a range of positive and adverse effects.
- ii. Potential positive urban design effects include the efficient use of land close to a major public RTN investment; maximisation of high-quality coastal views for as many residents as possible (rather than privatising it for high-price, low-density development as has been the historic norm in Auckland); and a substantial contribution to passive surveillance of the street.
- iii. Potential adverse effects other than those that contribute to neighbourhood character include shadowing, visual dominance, and loss of privacy. I would disagree that the act of being able to see buildings generally in an urban environment can be reasonably categorised as being fundamentally adverse.
- iv. In terms of general visibility of the buildings, personal aesthetic preferences mean that inevitably some in the community will find the buildings more or less attractive relative to one another, and there are no objective tools available to measure beauty as such. However, the buildings have clearly been designed to be visually appreciated and enjoyed. They will be interesting and will mitigate potential building scale effects by including several common techniques including:
 1. An avoidance of large sections of flat blank walls along facades.
 2. Incorporation of a variety of materials, finishes and surface planes that will create a sense of visual depth and creation of shadow lines across the buildings.
 3. Generous provision of glazing to add variety to the facades as well as provide two-way engagement between indoors and out.
 4. Differentiation of the top storey in a darker and more recessive tone, and incorporation of cut-outs / overhanging roofs at the street to also give a sense of the building stepping back slightly at its top (and to give more shape to the building silhouette).
- v. The above techniques will also reasonably mitigate the potential visual dominance effects of the buildings.
- vi. In terms of visual privacy and shadowing, I consider that only the properties to the south / south-east at 2 and 4 Susanne Place are likely to be affected. Separation distance on all other sides will mitigate potential adverse effects. In terms of 2 and 4 Susanne Place, Building A will not create effects of concern. In terms of Building B, it has been designed to be set-back and have a reduced height / stepped footprint to limit adverse effects. Although shadows will be cast in mid-winter, these will rapidly rotate around the

neighbours' sites and are not unreasonable noting the building's setbacks from the boundaries does offset additional height (in terms of shadow tracking). The placement of habitable room windows also limits potential overlooking of 4 Susanne Place, and I have made recommendations to enhance privacy for 2 Susanne Place, as well as in terms of acoustic and visual privacy from the ground floor level car park.

- vii. But overall the proposal will have adverse effects on 2 and 4 Susanne Place, and users of those sites - taking into account also the built form outcomes typically expected in the MHS zone - that will be at least minor.

c. Pedestrian access to Building B

- i. The proposal is for a single point of pedestrian entry to the Site adjacent to Building A, which then splits across the one-way entry driveway to Building B. I have no concern with this in principle, including as it directs all visitors to a single point of formal lobby or arrival and will be useful including in terms of on-site security.
- ii. But the plans also show a recessed drop-off type parking bay that sits across this and, when occupied by a vehicle, could impede pedestrian access from the street to Building B, and travel generally between the two buildings. I do not support this unless it is an emergency space such as for an ambulance that would be almost never occupied. If that is the intended use, it should be signed appropriately. Otherwise (and in any event my overall preference), the space should be shifted eastwards to be fully clear of the footpath connection and allow direct unimpeded views between the doors of each building.

d. Fencing and landscaping

- i. I have made a recommendation for fencing along the southern and south-eastern boundaries (2 and 4 Susanna Place) to enhance acoustic and visual privacy for these neighbouring properties.
- ii. Although urban designers prefer low-height fences (ideally 1.2m or less, retirement villages do frequently seek higher fencing to allow for more assured site security. On the basis that the landscape plans indicate a highly visually permeable rail-type fence (at least 75% visually permeable), I would not have an urban design objection to that.
- iii. Along the front boundary is what is notated on the landscape plans as "medium hedge". The associated description notes: "*develops a visual barrier between street & ground floors, and the property on the South-Western property*". I support this for the south-western boundary but consider it is not acceptable along the street frontage, undermining the point of positioning communal activities at the street and diminishing an important (in urban design terms) visual connection and activation opportunity here. I recommend that this be reduced to a height of no more than 1.2m.

- e. Site coverage and landscaped area
- i. The proposal infringes the site coverage standard and at the same time provides less on-site landscaped area than the zone standards expect.
 - ii. In terms of minimum landscaped area, I do not see this as giving rise to any adverse effects of concern. The proposal will have a generously landscaped front yard and, although car parking and a one-way vehicle loop is also proposed, the buildings will appear spaciouly separated from one another. The proposal also complies with the coastal yard setback. Providing more landscaped area, such as by removing car parks, would not in my opinion make a demonstrable overall urban design difference other than the likely slight positive effect for Site occupants looking down at more landscaping than car parking (noting the removal of car parking would likely be a disbenefit for many residents too).
 - iii. The building coverage infringement is however more problematic and does in my opinion combine with and exacerbate some of the proposal's building height and built character-related adverse effects. In combination, the building coverage infringement does worsen these and a reduction in Block B, in particular, of the order of 166m² (its footprint is 681m²) would make a substantial and obvious difference – particularly if such a reduction (approaching 25% of the footprint) occurred from the street and/or southern boundary.
 - iv. For simplicity I have approximated the southern section of Building B (that steps down to 5-storeys at the street and 1-storey in the south-eastern corner) as representing the notional extent of infringement. If this was limited to a maximum of 3-storeys (which would amount to the 5-storey section being reduced by 2-storeys), I confirm that I would not have building coverage-related concerns. Such a scenario would also lessen the overall character and height-related adverse effects of the proposal, and in the case of 2 Susanne Place, make a material reduction in adverse effects. It would also in many respects embody part of the scenario pointed towards earlier at paragraph 19(a)(ix).
 - v. But as it stands I consider that the proposed building coverage infringement and expression in buildings up to 6-storeys in height will contribute to at least minor adverse effects on neighbourhood character, and users of 2 and 4 Susanne Place.
 - vi. I refer to paragraph 19(a)(ix) above. In the scenario where no weighting was given to the NPS: UD, then the proposed building coverage could still be achieved but only if the overall range of building massing and heights on the Site was substantial revisited. In a full-height-compliance scenario (8-9m heights), the proposed building coverage would not raise any urban design concerns; it is the combination of building coverage and height / massing together that is creating the key tensions with the MHS zone's planned outcomes.

Recommendations

20. I consider that:

- a. Overall the proposal is for a high-density urban character IRD within an area identified by the NPS: UD as being required to enable 6+ storey building heights, but in an operative MHS zone seeking predominantly 2-storey buildings. Although infringing several AUP standards but on the basis that the NPS: UD's expected outcomes are to be balanced alongside the MHS zone if not favoured ahead of them, the proposal's effects will be acceptable but adverse effects would be at least minor (and I would expect in the eyes of some locals as more than minor based on how out-of-existing character the proposal is).
- b. In terms of overall merit, based on the above and subject to the recommendations that follow, the proposal could be granted consent on urban design grounds.

21. I recommend that:

- a. A lighting plan shall be submitted to the Council for certification at the time of Building Consent ensuring that pedestrian access to the building entrances and car parking spaces will be convenient and safe in the nighttime.
- b. A 2m tall, solid / gapless acoustic-rated fence (e.g., dense plywood) should be provided along the property boundaries with 2 and 4 Susanne Place so as to contain noise and headlight glare associated with the parking area and vehicle exit.
- c. The car parking space shown immediately adjacent to the Building A entrance and sitting across the pedestrian access path to Building B should be either repositioned to sit east and clear of that footpath link, or be clearly marked as being for emergency vehicle use only.
- d. South-facing habitable room windows on Building B adjacent to 2 Susanne Place on Levels 4 and 5 (i.e. excluding the car park and 2 habitable floors above that) shall have privacy screens or louvres attached to mitigate potential visual privacy and overlooking effects on users of the neighbouring property. The reason for excluding the bottom-2 habitable floors is that their setback distance and angle of view relative to the 2m acoustic boundary fence recommended will itself avoid or mitigate intrusive overlooking effects.
- e. Any hedge planted at the front boundary or in front of the buildings adjacent to Edgewater Drive shall be maintained to a height no greater than 1.2m.

Please feel welcome to contact me should you wish to discuss any aspect of the above further.

Yours sincerely,



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ATTACHMENT 1 – RELEVANT URBAN DESIGN LIMITATIONS AND REFERENCES

- a. This report is limited by the information provided at the time of writing and any responsibility for ensuring the correctness of that information rests with the party or parties that produced it. Specific reliance has been placed on architectural, landscape, planning and engineering advice.
- b. This report has been prepared solely for use in the context of the Resource Management Act 1991 and the application made for resource consent by A & L Sargeant at 147-153 Edgewater Drive, Pakuranga. To that end:
 - i. The report focuses on whether the proposal is acceptable through an urban design lens, but only in terms of the RMA matters that apply and only to the extent that those matters reasonably provide for or seek urban design outcomes.
 - ii. The report does not offer a 'pure' urban design assessment based only on best-practice or 'text-book' urban design preferences that might otherwise generally apply.
 - iii. In consequence it could be possible at one extreme for support to be given to a proposal that was poor in general urban design terms but which satisfied all applicable RMA matters; and at the other extreme a proposal could be opposed even if it was quite successful in general urban design terms but failed the applicable RMA matters.
- c. Unless otherwise specified in this report due to the presence a superseding project-specific definition, "urban design" relates to configuring physical space so as to **maximise the quality, safety, and prominence of public (or publicly usable) spaces, including the integration of development on adjoining private spaces**. Some contributing authorities are:
 - i. Carmona, M., et. al., 2021, *Public Places Urban Spaces: The Dimensions of Urban Design* (3rd ed.).
 - ii. Couch. C., 2016, *Urban Planning: An Introduction* (2nd ed).
 - iii. Department of Planning, Lands and Heritage, State of Western Australia, *Liveable Neighbourhoods*, www.wa.gov.au/government/publications/liveable-neighbourhoods, January 2024.
 - iv. Department of Transport and Planning, State of Victoria, *Urban Design Guidelines for Victoria*, www.planning.vic.gov.au/guides-and-resources, January 2024.
 - v. Larice, M., and Macdonald, E., (editors), 2012, *The Urban Design Reader* (2nd ed).
 - vi. Miller. C., and Beatie. L., (editors) 2022, *Planning Practice in New Zealand* (chapter 14) (2nd ed).
 - vii. Ministry for the Environment, 2003, *People Places Spaces: A Design Guide for Urban New Zealand*.
 - viii. Ministry for the Environment, 2005, *Urban Design Protocol*.
 - ix. Ministry of Justice, 2005, National Guidelines for Crime Prevention through Environmental Design in New Zealand, *Part 1: Seven Qualities of Safer Places*.