

**UNDER**

the Resource Management Act 1991  
("RMA")

**IN THE MATTER**

of the Proposed Waikato District  
Plan: Hearing 9 – Business and  
Business Town Centre.

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

**URBAN DESIGN**

**24 JANUARY 2020**

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**ELLIS GOULD  
LAWYERS  
AUCKLAND**

**Level 17 Vero Centre  
48 Shortland Street, Auckland  
Tel: 09 307 2172 / Fax: 09 358 5215  
PO Box 1509  
DX CP22003**

**REF: Daniel Sadlier / Alex Devine  
AUCKLAND**

## **1. Executive Summary**

1.1 My full name is Cameron Wallace. I am an Associate Urban Designer at Barker and Associates (“**B&A**”). I am providing urban design evidence on behalf of Kāinga Ora-Homes and Communities (“**Kāinga Ora**”) (formally Housing New Zealand Corporation) in relation to the submissions it made on the Proposed Waikato District Plan (“**PDP**” or “**Plan**”) insofar as they relate to this hearing. Primarily, this hearing relates to Chapter 17 and 18 – Business Zone/ Town Centre Zone and associated Objectives and Policies in Chapter 4 of the Proposed Waikato District Plan.

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

- (a) A discussion in relation to Kāinga Ora’s submission points 749.6-9 and 749.134-137 in relation to residential activities within the Business Town Centre zone where I consider amendments to the PDP are needed to enable that activity to occur.
- (b) A discussion in relation to Kāinga Ora’s submission points 749.132 and 749.146 on the appropriateness of reducing minimum unit area standards to better support the policy framework of the PDP and enable higher density housing.
- (c) A discussion in relation to Kāinga Ora’s submission point 749.135 seeking a reduction in minimum dimensions for living courts above ground level.
- (d) A discussion regarding Kāinga Ora’s submission points 749.151-152 in relation to the value the urban design guidelines and character statements contained within the PDP support good design outcomes and the alignment of these with proposed development standards within the Business and Business Town Centre zones.

## **2. Introduction**

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

consultancy. A core part of my current role is to provide up-front urban design input into a wide range of development schemes, including mixed-use, multi-unit residential buildings, retirement villages

## **Experience**

- 2.2 I hold a Master of Urban Design (1<sup>st</sup> Class Honours) and Bachelor of Planning (1<sup>st</sup> Class Honours) from the University of Auckland. I have been a Full Member of the New Zealand Planning Institute since 2014 and am a Member of the NZ Urban Design Forum.
- 2.3 I have 11 years' professional experience working in urban design and urban planning, gained in both the public and private sector, in the United Kingdom and New Zealand. Since 2018, I have been employed as an urban designer at B&A. In my current role I regularly assist local authorities and government departments with policy and district plan development in relation to growth management and urban design matters. I also provide up-front urban design input into a wide range of development schemes for private clients and Auckland Council, including multi-unit residential buildings in both greenfield and brownfield environments as well as more traditional greenfield subdivisions across New Zealand.
- 2.4 Prior to my employment at B&A I worked for over 3 years as a City Planner, then Principal City Planner, at Transport for London where I assisted in the development of planning frameworks to support residential and employment growth in "Opportunity Areas" across Greater London. Prior to that I was employed by Opus International Consultants as a planner and urban designer where, amongst other projects, I provided extensive urban design and planning advice as part of Auckland Unitary Plan process on behalf of several Ministers of the Crown, government agencies and private organisations.
- 2.5 Of particular relevance to the matters that will be covered in my evidence, I am or have been a member of design and planning teams for policy planning and development projects including:
  - (a) Nelson Resource Management Plan review, specifically provision of urban design advice in relation to of the proposed

Medium Density Residential Zone and identified growth areas of Kaka Valley and Saxton.

- (b) Drury Central Private Plan Change, specifically acting as the urban design lead assisting in the development of design related planning provisions to establish a new 110ha commercial centre in the vicinity of the proposed Drury Central Rail Station in South Auckland.
- (c) Auckland urban design reviews, specifically acting as a consultant urban designer reviewing resource consent applications for a range of residential, commercial and mixed-use schemes on behalf of the Auckland Design Office.
- (d) Urban design advice assessment, specifically provision of urban design advice and assessment for numerous residential, commercial and mixed-use schemes across New Zealand. This included acting as lead urban designer for the project team which successfully obtained consent for the first multi-unit residential development in Palmerston North under the provisions introduced as part of Plan Change 20 to the Palmerston North District Plan.

### **Involvement in the Plan Change**

- 2.6 I have been commissioned by Kāinga Ora to prepare this statement of evidence to address matters raised by the relief sought in Kāinga Ora's primary and further submissions (as successor to Housing New Zealand Corporation) in relation to Hearing 9 of the PDP covering the Business and Business Town Centre Zones.
- 2.7 I was not involved with the preparation of primary and further submissions, however, I can confirm that I have read the submissions and further submissions by Kāinga Ora in relation to the Proposed District Plan. I am also familiar with the national, regional and district planning documents relevant to the Proposed District Plan.

## **Code of Conduct**

- 2.8 I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2014. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving evidence. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

## **Scope of Evidence**

- 2.9 My evidence will address Kāinga Ora's primary and further submission points insofar as they relate to urban design matters, including the following:
- (a) Urban Environments (Chapter 4, covering Objectives and Policies);
  - (b) Business and Business Town Centre zones (Chapters 17 and 18, covering Rules and Assessment Criteria); and
  - (c) Related provisions cross referenced within Chapters 17 and 18 and included in Appendix 3: Design Guidelines and Appendix 10: Town Centre Character Statements of the PDP.

## **3. Submission Points 749.6 – 749.9 and 749.134 – 137 (Activity mix / Vitality of town centres)**

- 3.1 The primary submission from Kāinga Ora [ID13 - 18] sought amendments to several policies seeking additional recognition of the role and function of residential uses within town centres and business zones.
- 3.2 Overall, I support the strategic direction of the PDP as it relates to the business zones including the consolidation of land use activities within a compact urban form, encouraging higher density development in and around commercial centres as well as seeking to promote liveable, thriving communities.

3.3 From an urban design perspective, the benefits of enabling a mix of activities (including residential) in and around town centres environments is well documented.<sup>1</sup> Chapter 8 of the Town Centre Urban Design Guidelines<sup>2</sup> contained within Appendix 3 of the PDP also discusses these benefits:

*“Mixed use in town centres contributes to more active and vibrant communities – with residents sharing the street space with employers, employees and customers. It brings a sense of activation – particularly at night or outside of business hours, and may result in economic benefits through the introduction of new business opportunities to the area (such as hospitality).”*

3.4 Whilst seeking to enable residential above ground floor, the PDP has sought to make residential at ground floor within the Business Town Centre Zone a blanket non-complying activity.

3.5 From my experience, it is fairly common that District Plans provisions across the country do not allow residential at ground level within town centres or business zones as a permitted activity. Such provisions are, in my opinion, appropriate as residential at ground level in a town centre has the potential to detract from the desired street edge activation. There may also be privacy conflicts with residential at ground floor, depending on the overall site context.

3.6 However, in light of the benefits residential activity provides to centres I consider that the application of a blanket non-complying activity status to ground floor residential uses is not the most effective or appropriate means of managing potential urban design effects associated with this activity. There are a number of situations where ground floor residential could be entirely appropriate, such as:

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<sup>1</sup> See for example, Section 3.4 Mixed-use, from *The Value of Urban Design – The economic, environmental and social benefits of urban design*, Ministry for the Environment (2005); and *People, Places, Space – A design guide for urban New Zealand*, Ministry for the Environment (2004).

<sup>2</sup> Pg. 18.

- (a) On larger sites where ground floor residential uses can be set back and screened from the street by commercial uses.
- (b) Through the utilisation of live/work unit typologies which provide for commercial floor space fronting the street.
- (c) Near or at the interface with established residential areas.
- (d) On side or rear streets within a centre away from the 'main street' where footfall could typically be expected to be lower.
- (e) In response to the location of scheduled trees or heritage buildings.

3.7 A more common, and in my opinion more appropriate method, for managing the potential impacts is to identify key retail/ commercial frontages such as a main street where it would be beneficial for ground floor residential to be avoided. Examples of this approach can be seen in Chapter 7 of the Hamilton District Plan which provides for a graduated activity status from permitted to restricted discretionary to non-complying depending on the site's primary street frontage. As part of this the accompanying objectives, policies and assessment criteria provide a clear rationale for assessment as part of the resource consent process.

3.8 In light of the above, the default application of non-complying activity status creates unnecessary risk and uncertainty as part of the planning process such that it actively discourages the development of residential activity within town centres on sites with characteristics where it might be appropriate. This is particularly likely for larger sites within the Business Town Centre Zone, where due to their size, they provide the best opportunities to deliver on the strategic objectives and policies of the PDP focussed consolidation of urban areas and higher density living close to centres.

#### **4. Submission Points 749.132 and 146 – 18.4.2 Subdivision – Multi-unit development.**

4.1 The primary submission from Kāinga Ora [ID 115 and 128] seeks a range of relief in relation to the subdivision standards for multi-unit

development. Of particular relevance to my evidence is the relief seeking a reduction in the minimum unit standards. The PDP introduces the following minimum unit standards:

<b>Unit of Apartment</b>	<b>Minimum Unit Area</b>
Studio unit or 1 bedroom unit	60m <sup>2</sup>
2 bedroom unit	80m <sup>2</sup>
3 bedroom unit	100m <sup>2</sup>

Failure to comply with these standards triggers a requirement for a discretionary activity consent. Kāinga Ora sought general reductions to these to 30m<sup>2</sup> for studio/ 1 bedroom and 45m<sup>2</sup> for 2 bedroom or more.<sup>3</sup>

4.2 The minimum areas set out within the Kāinga Ora submission are broadly comparable with other towns and cities across New Zealand. For example:

- (a) Across residential and business zones, the Auckland Unitary Plan provides for minimum studio apartments sizes of between 30m<sup>2</sup> and 35m<sup>2</sup>, and 45m<sup>2</sup> for one or more bedrooms;
- (b) The Palmerston North District Plan enables dwellings with minimum sizes of 45m<sup>2</sup> without any qualifiers relating to bedrooms within identified multi-unit housing areas;
- (c) The Christchurch District Plan enables studio units of 35m<sup>2</sup>, and 45m<sup>2</sup> for 1-bedroom units
- (d) Other Councils such as Napier City and Wellington City do not have any minimum unit standards and instead rely on a design

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<sup>3</sup> It was noted that the minimum unit standard within the Business and Business Town Centre Zones sought by Kāinga Ora's primary submission was not aligned with their submission in relation to minimum unit sizes for residential zones. Upon discussion with Kāinga Ora, it was confirmed that this was an oversight and the intent of their submission was to seek a consistent minimum unit standard across zones of 30m<sup>2</sup> for studio units and 45m<sup>2</sup> for 1 bedroom or more.



lead approach to assessing the appropriateness of applications.

- 4.3 In addressing the proposed standards within the PDP, I consider that the application of the same area standard for both studio and 1-bedroom apartments fails to recognise that these are fundamentally different unit typologies. Studio apartments are, by definition, defined by the use of a single multifunctional room where living/ sleeping and cooking spaces are consolidated (with a separate bathroom/ toilet). I also note that I have never encountered, nor am aware of, any development having provided a 60m<sup>2</sup> studio apartment.
- 4.4 In terms of the other unit sizes, 1-bedrooms can comfortably be accommodated within a space as low as 35m<sup>2</sup>. 2-bedrooms can be sufficiently accommodated within a space as low as approximately 50m<sup>2</sup> whilst still enabling appropriately sized rooms to accommodate likely occupancy rates. In my experience, both as an urban designer and someone who has lived in multi-unit accommodation, units of these sizes still afford a good level of internal amenity and sufficient space to meet the needs of permanent accommodation. Plans demonstrating these are provided in **Attachment 1** to my evidence.
- 4.5 Whilst acceptable housing standards vary from culture to culture, place to place and time to time, there will be sectors of the community that are likely to accept smaller units for various reasons, not limited to price. The proposed unit areas are, in my opinion, unnecessarily large and have been set at a level which will actively discourage the development of multi-unit residential schemes within the Business and Business Town Centre zones and undermine the overall policy intent of the PDP. It is highly unlikely that an apartment development will be able to comply with these controls triggering requirements for a discretionary activity consent, and so adding risk in terms of time, cost and uncertainty to the development process which outweigh any design benefits.
- 4.6 The risk associated with infringements of any standards is then linked to the activity status associated with that infringement. As the PDP triggers a discretionary activity consent for infringements to

development standards, there is no specific guidance within the plan as to how an application would be assessed. Rather, discretionary activity status exposes an applicant to a large range of unanticipated matters for potential assessment. Further, in my experience, resource consent processing officers and the public generally interpret development standards as representing “bottom lines” which must be complied with, with any infringements generating adverse effects that must be addressed rather than as triggers for further or more detailed assessment. In this regard, the detailed provisions provided for within the PDP are restrictive, lack flexibility and are poorly aligned with the policy framework established in other sections of the plan.

- 4.7 At a more practical level, the specification of minimum unit sizes for dwellings based on number of bedrooms is redundant for anything more than a single bedroom. If multi-unit development was to be undertaken within the district to comply with the proposed minimum unit standards it would not be unreasonable to anticipate schemes for 60m<sup>2</sup> single bedroom units which also feature a range of other rooms such as “studies” or “formal lounges”. These can ultimately be adapted into bedrooms whilst still complying with the requirements of the Building Code.
- 4.8 The appropriateness of these standards has not been established, or indeed addressed to any great degree as part of the s32 analysis or within the s42a report. My understanding of the rationale behind the minimum unit sizes is limited to the following comment from the submission of Waikato District Council:<sup>4</sup>

*“to set a density standard that would determine the number of units that could be built on a site and to ensure that each residential unit is contained within an area that would enable subdivision”*

- 4.9 I note that there is no specific outcome or guideline contained within the Multi-unit Development Urban Design Guidelines of relevance to this issue. Similarly, there is no specific objective or policy with regard to restricting density within the Business or Business Town Centre

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<sup>4</sup> Point 294, pg. 181-182

zones. Conversely, Policy 4.1.5(a) actually seeks to “*encourage higher density housing ... to be located near to and support commercial centres...*”.

- 4.10 From an urban design perspective, I believe minimum unit size requirements whilst appearing simple are a blunt measure for controlling density or amenity outcomes that are unable to sufficiently take into account the natural variability that is caused by the design and layout of an apartment scheme to respond to a wide range of relevant factors including solar orientation, daylight, topography, circulation, and privacy. It is also worth acknowledging the growing emergence of the “tiny house movement” both in New Zealand and internationally as a response to the increasing costs of housing that are in part influenced by planning restrictions in any given location. Although recognising this is likely a niche market and not suitable for a range of living situations, tiny houses provide novel examples of how spaces as small as 16 – 20m<sup>2</sup> can be designed to accommodate a residential unit.
- 4.11 Whilst noting the above, as the internal area of a unit decreases greater care is required in terms of design and space planning to achieve a functional unit with sufficient amenity for occupants. As such, I believe there is some merit in providing at least some minimum standards within the framework provided by a district plan. Minimums, if set an appropriate level, will provide a degree of guidance to the development community over the potential yield on any given site. They can also provide assurance to the wider public around the likely form and typologies of dwellings which could be expected to occur across the district.
- 4.12 Accordingly, for the reasons I set out above, I consider that if minimum unit areas are to be included within the Plan, in order to support the development of higher density housing offering a sufficient standard of amenity within the Business and Business Town Centre zones, consistent with PDP policies that encourage compact urban growth near commercial centres, the minimum units area standard should be amended as follows:

Unit of Apartment	Minimum Unit Area
Studio unit	30m <sup>2</sup>
1 or more bedroom unit	45m <sup>2</sup>

4.13 In light of my position regarding minimum unit sizes set out in the paragraphs above, I believe it will also be important to ensure that assessment criteria for multi-unit development are effective in addressing internal amenity considerations. In line with the relief sought by Kāinga Ora, I would support consequential amendments to the relevant assessment criteria.

## **5. Submission Point 749.135 (living court)**

5.1 The primary submission from Kāinga Ora seeks a number of amendments to the standards and assessment criteria of the living court provisions as they relate to multi-unit development. The relief sought is aligned within the main thrust of Kāinga Ora's submission that the provisions relating to residential development in particular are overly restrictive and will not support the growth aspirations of the PRP.

5.2 The Kāinga Ora submission seeks a reduction in minimum living court dimensions from 2m to 1.5m whilst retaining minimum sizes of 10m<sup>2</sup> for studio and 1-bedroom units and 15m<sup>2</sup> for a 2 or more-bedroom unit. The minimum dimensions set out within the Kāinga Ora submission are broadly comparable with other towns and cities across New Zealand, whilst the area standards, are in my view, generous for this type of housing. For example:

- (a) Across business zones<sup>5</sup>, the Auckland Unitary Plan provides for minimum balcony sizes of between 5m<sup>2</sup> and 8m<sup>2</sup> with a minimum dimension of 1.8m;

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<sup>5</sup> This excludes the Business Mixed-Use zone where there is no requirement for the provisions of outdoor space for residential units located at upper floors.

- (b) The Palmerston North District Plan provides for minimum balcony sizes of 8m<sup>2</sup> without any minimum dimensions;
- (c) Plan Change 6 to the Hamilton District Plan provides for balconies of 8m<sup>2</sup> with a minimum dimension of 1.5m;
- (d) As with minimum units sizes, other Councils such as Tauranga City, Napier City and Wellington City do not have any minimum outdoor living standards for multi-unit developments at upper floors. Instead they rely on a design-led approach to assessing the appropriateness of applications.

5.3 The Kāinga Ora submission point regarding minimum living court sizes have been addressed in several parts of the s42A report. Paragraph 331 of the s42A report states “*the dimensions proposed (5m<sup>2</sup> and 1.5m minimum dimension) are so small as to make the living court unusable*”. I have been unable to locate any supporting analysis to justify this statement.

5.4 I concur with the principal expressed within the s42a report that outdoor living spaces (if provided) should be of a usable size and dimension for the design occupancy of the unit they serve. I would also note that there are a number of other important considerations other than sizes / dimensions that relate to the creation of a “useable” outdoor space. These include orientation, relationship with living spaces, solar access and privacy. These matters are reflected in some of the assessment criteria relating to living courts.

5.5 I note that Kāinga Ora have only sought a reduction in the minimum width of outdoor living spaces, not in the minimum area. As such, it is necessary to consider the adequacy of a minimum dimension of 1.5m in the context of a minimum area of 10 or 15m<sup>2</sup> as sought in the PDP provisions. I note that a 1.5m dimension enables the placement of a small table and chairs whilst preserving circulation space around one side. This, in combination with the minimum areas would also allow for outside clothes drying with a drying rack, a small barbeque and potentially some small pot plants.

5.6 Paragraphs 447 and 670 of the s42A also goes on to state:

*“Due to their location in the Business zone, dwellings may not have ready access to outdoor space on the site or **nearby**. It is accepted that there is additional cost in the provision of larger living courts, however this needs to be balanced with the need to provide residential amenity” (my emphasis added).*

5.7 With the exception of Pokeno, the above statement does not align with a high-level analysis of the location of Business and Business Town Centre zones relative to surrounding amenities including open spaces or community facilities. For example:

- (a) Tuakau town centre surrounds a central town square and is located in close proximity to, or directly adjoins, other open spaces including Centennial Park and Dr John Lightbody Reserve;
- (b) The Huntly town centre and surrounding business zone directly adjoins the Waikato River including associated esplanade reserve with various other parts of business zoned land within approximately 400-500m walking distance of Davies Park, Huntly Domain and Lake Hakanoa.
- (c) Ngaruawahia town centre and surrounding business zone land is located adjacent to Ngaruawahia Domain, Jesmond Street open space and is in the immediate proximity of both the Waipa and Waikato River esplanade reserves. The area also includes the Ngaruawahia library.
- (d) Raglan town centre and surrounding business zone lies directly adjacent to Raglan Harbour / Waterfront and within 400m of Wahihi Park, Aro Aro Park and Raglan Domain / Te Kopua Beach.

5.8 In and around centres where higher density residential uses are envisioned, there is generally more proximate access to off-site amenities not limited to parks as identified in paragraph 5.7 above but also includes entertainment facilities, social facilities, as well as food and beverage outlets. Combined, these serve to reduce the requirement for on-site outdoor living areas and are an important

'trade-off' that distinguishes low-density suburban housing from more intensive housing in and around centres.

5.9 Based on a consideration of the above, from an urban design perspective the amendments sought by Kāinga Ora are considered appropriate and will still enable the development of useable, well-located outdoor spaces within multi-unit developments.

**6. Submission Points 749.151 and 152 (Urban Design Guidelines / Character Statements)**

6.1 The primary submission from Kāinga Ora [ID132 and 133] seeks the removal of the Town Centre Urban Design Guidelines and Multi-unit Development Urban Design Guidelines along with various Town Centre Character Statements contained within Appendices 3 and 10 and referenced in several objectives, policies and assessment criteria through the PDP.

**Urban Design Guidelines**

6.2 In my experience, achieving positive design outcomes as well as addressing any adverse effects within the statutory framework established under the RMA depends on the quality of planning and design provisions contained within the relevant planning document, typically through a combination of objectives, policies, rules, and assessment criteria.

6.3 Based on my analysis as part of the preparation of this evidence as well as a review of the various Urban Design Guidelines applicable to the business zones, it appears that the development standards and guidelines have been prepared in isolation from one another (see for example sections 4 and 5 of my evidence above discussing minimum unit and living court sizes). Whilst I support the principles expressed within these guidelines, I see little usefulness in the application of design guidelines which, in my view, do not reflect nature of existing subdivision patterns in the district nor the primary bulk and location controls covering sites to which they are intended to apply. This misalignment invariably will create situations where to achieve the outcomes sought within the design guidelines, infringements to one

or several development standards would be required. I consider this to be contrary to good urban design and planning practice.

- 6.4 I also note that within the context of the business zones, the extent to which a development is consistent with the Urban Design Guidelines for Multi-Unit development is identified as a matter of discretion. Based upon a review of these guidelines it is clear they have not been developed with consideration for mixed-use developments within a town centre environment. Whilst issues regarding mixed-use development are clearly established within Section 8 of the Town Centre Urban Design Guidelines, it is not clear from the assessment criteria in the proposed Business and Business Town Centre zones as to how these inconsistencies should be reconciled through the design process or what weighting each guideline (or character statement as discussed further below) will possess in the event of conflicting requirements and / or outcomes sought.

### **Character Statements**

- 6.5 In terms of the character statements contained within the PDP, it is noted within the policy framework of the PDP<sup>6</sup> there is a desire to consolidate settlement within existing urban areas and to encourage higher density near to commercial centres to support a compact urban form. In this regard, the policy framework within the PDP clearly anticipates a change to the existing character of town centres and urban environments across the district.
- 6.6 In my opinion, the Character Statements as included within the PDP are inconsistent with these anticipated outcomes. The Character Statements are focussed solely on the existing built character and exclude any consideration of the planned future character of these areas as it relates to built form. They seek to direct outcomes which would maintain the existing scale and pattern of development. For example, the Character Statement for Pokeno town centre seeks to “encourage new development that is sympathetic to the ... existing main street built-form” which is identified as “predominantly single

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<sup>6</sup> See, for example, Strategic Objective 1.12.3 and Policies 4.1.2 and 4.1.5(a)



level”. Whilst this approach is generally appropriate when dealing with areas or buildings with recognised historic or cultural heritage, I do not consider it helpful in assisting the design of new buildings within a centre where a clear expectation of change is established in the overarching planning framework.

- 6.7 New development in a familiar urban area, such as the established centres across the district, is not inherently a bad outcome. Indeed, change and evolution in terms of built form and activity can generally be regarded as a normal characteristic of successful urban centres that should be encouraged. This is reflected in the design qualities of “character” and “choice” contained within the New Zealand Urban Design Protocol:

**“Character**

*Quality urban design reflects and enhances the distinctive character and culture of our urban environment, and recognises that character is dynamic and evolving, not static...”*

**“Choice**

*Quality urban design fosters diversity and offers people choice in the urban form of our towns and cities, and choice in densities, building types, transport options, and activities. Flexible and adaptable design provides for unforeseen uses, and creates resilient and robust towns and cities.”*

- 6.8 Based on the discussion above, I consider that the relief sought by Kāinga Ora in respect of the removal of the urban design guidelines and character statements to be appropriate. If the guidelines and character statements are to be retained, it would be desirable, from an urban design perspective, to adapt the outcomes sought within these documents into a stronger and clearer framework for the assessment of developments within the Business and Business Town Centre Zones.

## **7. CONCLUSION**

- 17.1 In conclusion, the provisions of the PDP as they relate to residential activities within the Business and Business Town Centre zones are unlikely to enable residential activities to occur in these zones. In

some instances I consider that the provisions, as proposed, will actively undermine positive urban design outcomes from occurring in and around the district's town centres in the manner anticipated by the strategic objectives of the PDP.

- 17.2 Overall, it is my opinion that the amendments sought by Kāinga Ora (as outlined in this evidence) are appropriate and will assist in delivering the urban design outcomes sought by the strategic objectives for the district set out within the PDP in a manner consistent with good urban design practise.

**Cameron Wallace**

**24 January 2020**

## **Attachment 1: Example Apartment Unit Floorplans**

# Studio Unit Configurations - 30m<sup>2</sup>

Scale 1:100 @ A4

3.0



10.0

6.0



2.5

5.0

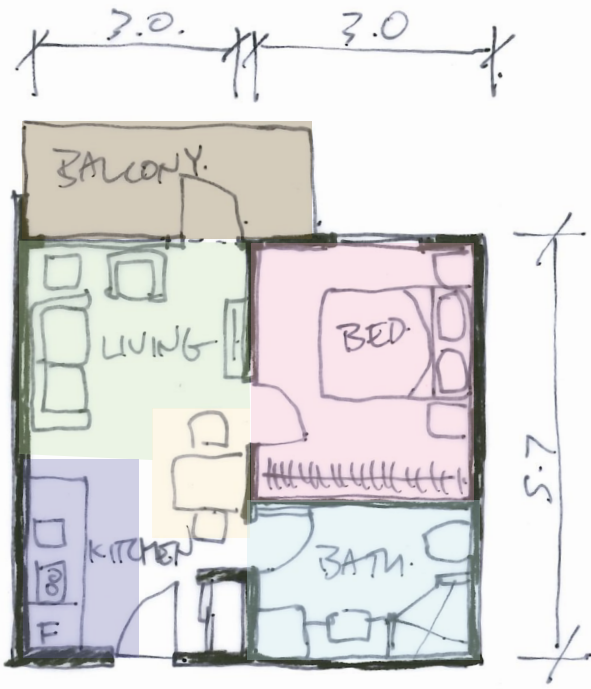
2.1

## Legend

- Bedroom
- Living area
- Dining area
- Kitchen
- Bathroom
- Balcony

# 1-Bedroom Unit Configurations

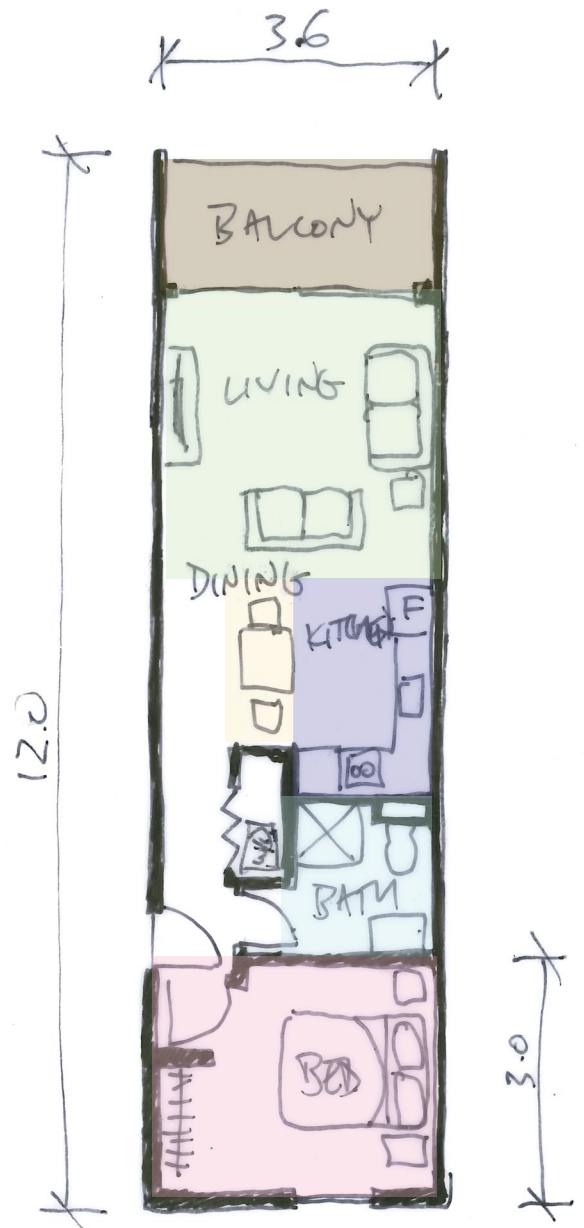
Scale 1:100 @ A4



35m<sup>2</sup>



38m<sup>2</sup>



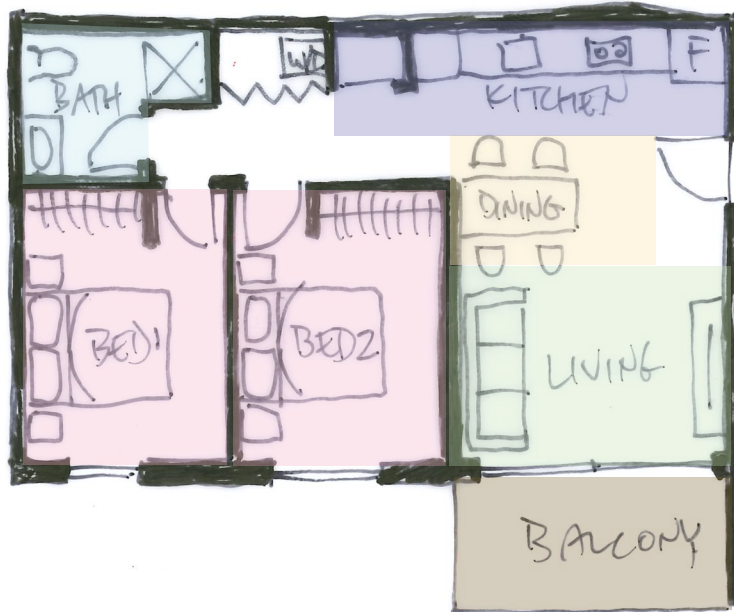
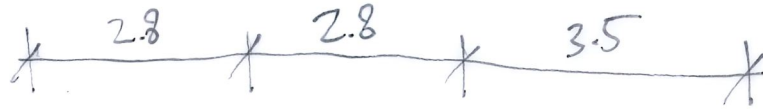
44m<sup>2</sup>

## Legend

- Bedroom
- Living area
- Dining area
- Kitchen
- Bathroom
- Balcony

# 2-Bedroom Unit Configurations

Scale 1:100 @ A4



56m<sup>2</sup>



54m<sup>2</sup>

### Legend

- Bedroom
- Living area
- Dining area
- Kitchen
- Bathroom
- Balcony