

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

**URBAN DESIGN**

**12 FEBRUARY 2020**

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## **1. Introduction**

- 1.1 My full name is Cameron Wallace. I am an Associate Urban Designer at Barker and Associates. I have been commissioned to provide urban design evidence on behalf of Kāinga Ora-Homes and Communities (“**Kāinga Ora**”) relating to their submissions and further submissions on the Proposed Waikato District Plan (“**PDP**”). My qualifications and experience are set out in paragraphs 2.1 to 2.5 within my Evidence in Chief (“**EiC**”) dated 24 January 2020. The purpose of this statement is to summarise my EIC.
- 1.2 My EiC for Hearing 9 addresses various provisions relating to residential activities within the Business Town Centre and Business Zones for which Kāinga Ora made a number of detailed submission points.
- 1.3 There are three areas where I disagree with the recommendations of the Council in the s42A as it relates to the Business Zones. These are summarised below:
- (1) The way in which ground floor residential activities have been addressed in the Business Town Centre Zone;
  - (2) Proposed development standards applying to multi-unit development in both the Business Town Centre and Business Zones; and
  - (3) The use of, and reference to Urban Design Guidelines and Character Statements within the PDP.

## **2. Summary of Evidence**

- 2.1 From an urban design perspective, my EiC supports the overall strategic direction of the PDP as it relates to urban environments across the District. In particular, consolidation of existing towns, provision for a variety of housing forms, and encouraging higher density housing near commercial centres. However, as set out in my EiC, I am of the opinion that the detailed provisions of the PDP are not the most effective or appropriate means to support the strategic objectives of the PDP.

### ***Ground Floor Residential Activity***

- 2.2 I address Kāinga Ora’s submissions relating to ground floor residential activities within the Business Zones in paragraphs 3.1 – 3.8 of my EiC. In summary, Council’s approach as notified did not adequately recognise the urban design benefits that residential activities can provide to commercial centres and the significant capacity of business zoned land available across the District.<sup>1</sup> I support the intent of the recommended changes to Policy 4.5.11 as recommended in paragraph 20 of the rebuttal evidence of Mr Matheson. However, I disagree with the activity status applicable to these activities and the general approach to managing this issue and consider further changes to the rules are necessary to remove ambiguity created by the proposed amendments to Policy 4.5.11.
- 2.3 In my experience, non-complying activity status generally carries an inherent “deterrent value” and can effectively prevent applications for resource consent being made for activities due to actual or perceived risks of a ‘non-complying’ consenting process. From an urban design perspective, this consenting risk can result in sub-optimal design or activity mix outcomes being adopted simply because they offer a more straightforward consenting process. As I set out in paragraph 3.6 of my EiC, there are a number of situations where ground floor residential activities can be appropriate (and beneficial) in the Business Town Centre Zone. In my opinion, a “key retail / commercial frontage” control provides a more nuanced and appropriate approach to the issue that protects important commercial land whilst enabling residential development to support the vibrancy and vitality of commercial centres across the District.

### ***Multi-Unit Development Standards***

- 2.4 I address Kāinga Ora’s submissions on the various development standards applying to multi-unit development within the Business Zones in sections 4 and 5 of my EiC. In summary, the dimensions specified for minimum unit sizes and outdoor living courts are

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<sup>1</sup> As set out in Section 6 of the Economic Evidence of Mr Osborne lodged on behalf of Kāinga Ora.

unnecessarily large and will actively discourage multi-unit development in and around commercial centres and are poorly aligned with the higher order provisions of the PDP.

- 2.5 Within the scope of the relief sought by Kāinga Ora's submission, I have made recommendations in paragraph 4.12 of my EiC on appropriate minimum unit sizes. I have also assessed the appropriateness of Kāinga Ora's relief sought in respect for development standards relating to outdoor living courts in paragraphs 5.5 – 5.8 of my EiC. I note that in paragraph 83 of Mr Matheson's rebuttal evidence, he appears to concur that the standards related to multi-unit development are exhaustive, inflexible and contrary to higher order objectives and policies.

### ***Urban Design Guidelines***

- 2.6 I address Kāinga Ora's submissions regarding use of Urban Design Guidelines (Town Centre & Multi-Unit Development) and Character Statements in paragraphs 6.1 – 6.8 of my EiC. In summary, 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. Similarly, the Character Statements seek to focus on a maintenance of the status quo in terms of design in town centres despite a clear expectation of change in the design of the built environment set out within higher order objectives and policies of the PDP.
- 2.7 This misalignment will, invariably, create uncertainty as part of the resource consent process and does not provide sufficient guidance to designers or the development community as to the anticipated outcomes sought by the PDP<sup>2</sup>. Based on this, it is my opinion that the relief sought by Kāinga Ora in respect of the removal of the urban design guidelines and character statements is appropriate.

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<sup>2</sup> I note that this matter has also been raised in paragraph 5.33 of Mr Gibbs' Architectural and Urban Design evidence for Hearing 10 – Residential submitted on behalf of Chen, CSL Trust and Top End Properties. I concur with the concerns raised by Mr Gibbs and consider them relevant to this Hearing topic as well.

### **3. Conclusion**

- 3.1 Overall, it is my opinion that the recommendations of Council are not the most appropriate or effective methods, in urban design terms, of achieving the higher order objectives of the PDP and the purpose of the RMA. The relief sought by Kāinga Ora, as well as the related changes I have discussed in my EiC are, in my opinion, more appropriate means for achieving strategic objectives of the PDP and the purpose of the RMA. I am happy to take any questions you may have.

**Cameron Wallace**  
**12/02/2020**