Before Wellington City Council

Under the Resource Management Act 1991

In the matter of Plan Change 81: Rezoning 320 The

Terrace and de-listing the Gordon Wilson

Flats

STATEMENT OF EVIDENCE OF ANDREW DAVIES BURNS (URBAN DESIGN)

1 December 2015

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INTRODUCTION

1. My full name is Andrew Davies Burns.

Qualifications and Experience

- 2. I am a qualified urban designer with a Diploma and Master of Arts in Urban Design (with Distinction) from the Joint Centre for Urban Design (1997, Oxford Brookes University, Oxford, UK). I hold a Bachelor of Architecture degree (1992, Victoria University of Wellington), am a Member of the Royal Town Planning Institute (MRTPI) and Fellow of the Royal Society of Arts (FRSA).
- 3. I am a director at McIndoe Urban Ltd, a specialist urban design practice based in Wellington, a member of the Auckland Urban Design Panel and an External Examiner for the School of Architecture, Victoria University of Wellington. Prior to that I was a director of Matrix Partnership Ltd, a multi-disciplinary (urban design, architecture, landscape, town planning) practice in London, UK from December 2003 to April 2013 and seconded urban design director to Arup (South Africa, 2012) as project director for the capital city masterplan of Pretoria. Prior to these roles I worked as an urban designer for Urban Initiatives Ltd (London) and DEGW plc (London) from 1997 to 2003. In total I have 22 years professional experience (18 years since gaining my post graduate urban design qualifications, and a further 4 years of prior experience in architecture).
- 4. In parallel with my practice work I held part-time lectureships at Masters level in urban design at Oxford University, Department for Continuing Education, Kellogg College (August 2010 March 2013, MSc course in Sustainable Urban Development), and Oxford Brookes University, Joint Centre for Urban Design (August 2006 March 2013, MA course in Urban Design), and The Bartlett School of Planning, University College London (2004-6).
- 5. A selection of relevant professional experience in NZ includes:
 - (a) Providing urban design advice to WCC and PNCC for Resource Consent Review (I am WCC's primary advisor to Council in this regard).

- (b) Preparing design briefs and options studies for publicly significant sites in Wellington (Civic Square and the MFC, Jervois Quay) for WCC.
- (c) Expert Witness (urban design) relating to Plan Change 77 in Wellington.
- (d) Campus development masterplanning for Victoria University of Wellington, Massey University and Universal College of Learning (UCOL).
- (e) Preparing an urban design review of the Proposed

 Christchurch Replacement District Plan (2015) for Christchurch

 City Council and preparing submissions on the Christchurch

 District Plan relating to new mixed use locations.
- (f) Co-authorship of the Auckland Design Manual for Auckland City Council (lead author for residential chapters) in support of the Auckland Unitary Plan.
- 6. In the UK (2010/11) I was co-author of Design Council CABE's national masterplanning publication 'Creating Successful Masterplans' (http://webarchive.nationalarchives.gov.uk/20110118095356/http://www.cabe.org.uk/masterplans). I have also drafted numerous design and policy related documents for UK Local Authorities including planning briefs for mixed use sites, character area studies, public realm strategies, urban growth masterplans and city centre regeneration frameworks.

Code of Conduct

7. I confirm that I have read the Code of Conduct for expert witnesses in the Environment Court Practice Note 2014 and that I have complied with it when preparing this evidence. Other than when I state that I am relying on the advice of another person, this 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 that I express.

Involvement with Plan Change 81

- 8. McIndoe Urban was appointed in December 2014 by Victoria
 University of Wellington (VUW) to provide urban design advice to
 inform Plan Change 81 for 320 The Terrace (the Site). I have been
 engaged on the project since that time and was the lead consultant
 from my practice providing urban design expertise.
- 9. I have visited the site many times including for detailed investigations in December 2014. I have reviewed both the site and its wider context and prepared the urban design report for the Site (April 2015) at Appendix 1. I took part in numerous consultant team meetings with VUW and attended the recent meeting with Wellington City Council's urban designer Lucie Desrosiers and planning officer Daniel Batley on 4th November 2015.
- 10. I prepared a summary report (Memo, June 2015 at Appendix 8 of PC81 original documents), that provided an urban design assessment of the Plan Change and particularly focused on assessing the appropriateness of the proposed building standards (Appendix 2 of PC81 original documents) and the appropriateness of the control of building design, appearance and landscaping and the amended VUW Design Guide. That assessment was informed by my initial urban design report (April 2015) that identified ten key principles that should apply to any new development on the Site.

Scope of Evidence

- 11. I have read the Council officers' Section 42A report dated 25 November 2015, which recommends a decision confirming the proposed Plan Change, and I support that recommendation with a minor reservation relating to Attachment A, item 3 that I address later in my evidence. I have been asked by VUW to provide this statement of evidence covering:
 - (a) A summary of my urban design report (April 2015) and urban design assessment (30 June), that informed the contents of Plan Change 81 as lodged;

- (b) An outline of subsequent discussions with Council Officers on matters of urban design, and the further information and refinements that respond to matters raised in those discussions;
- (c) Responses to issues raised by submitters relevant to matters of urban design;
- (d) Those matters on which I disagree with the Officers' Report, being: at Attachment A, item 3 the recommendation for an additional guideline (G4).

SUMMARY OF URBAN DESIGN ASSESSMENT

- 12. Below (at paragraphs 14 to 28) I provide an outline of my 30 June 2015 and April 2015 urban design assessments, and describe how they are reflected in the PC81 provisions as initially sought.
- 13. A copy of the reports I produced to inform the Plan Change include:
 Urban Design Report April 2015 (attached to this statement as
 Appendix 1); and, Urban Design Assessment Memo 30 June 2015
 (attached to the PC81 application, as Appendix 8). I have not repeated the detail in this statement of evidence but am relying on that to inform the Panel. The report and assessments involved:
 - (a) A review of the Site and its immediate and wider context in relation to a range of urban design matters (April 2015).
 - (b) The identification of ten key principles to which any future development on the Site should respond (April 2015).
 - (c) An assessment of the Plan Change 81 provisions in respect of proposed permitted building standards (30 June 2015).
 - (d) An assessment of the Plan Change 81 provisions in respect of the revised VUW Design Guide (30 June 2015).

The conclusions of these reviews and assessments is described in full in those reports.

Urban Design Report - April 2015

- 14. I provide below some extracts that confirm the overarching urban design issues as described in the report.
- 15. Regarding contextual relationships the report states:1

"The Site has the potential to contribute towards a more positive relationship between the escarpment, the city and the character of The Terrace than currently exists. Importantly it can open up new connections to Kelburn and enhance choice for a range of users."

16. Regarding the role of the site for VUW the report states:2

"The Site is highly significant to the university in so far as it can establish: a new front door and 'gateway' to the city; a physical and visible presence that can overcome perceptual and real access barriers; and, accommodation for new facilities."

17. Regarding scale and grain the report states:3

"...given the nature of the Site's relationship both to areas 2 and 3 [refer to Figure 4 where area 2 displays large course grained VUW buildings atop the ridge and area 3 displays finder grained development along The Terrace], an approach to development that is transitionary forming a larger scale built form link to The Terrace could be investigated. Such an approach would need to present development forms that relate to The Terrace scale and the permitted scale of neighbouring buildings as well as the campus above."

18. Regarding spatial patterns the report states there are two spatial patterns or conditions across the Site.⁴ Condition 1 is:

"An orthogonal grid (city) on a north north east - south south west alignment."

Condition 2 comprises:

"Curvilinear alignments that occur between areas of the city (orthogonal) grid and relate to the steeper topography of those areas."

And:

¹ Page 1, 3rd paragraph.

² Page 1, 5th paragraph.

³ Page 5, 4th paragraph.

⁴ Page 7, 3rd, 4th and 5th paragraphs.

"The Site is ... located within these spatial patterns. Importantly this highlights the influence of both the orthogonal grid and the curvilinear conditions on the Site and suggests that future spatial patterns address both."

19. Regarding the escarpment the report states:5

"Future development on the Site should recognise the importance of the generally planted upper level slopes as part of a 'perceived' town belt and seek to establish views to the vegetated areas from the city centre (eg along Ghuznee Street and The Terrace)."

20. Regarding land use patterns the report states:6

"Compatibility of institutional activities alongside residential has been established elsewhere in the area and a future development comprising this mix could be considered appropriate on the Site."

21. Regarding building heights the report states:⁷

"Implications for the Site include: height towards the street edge that could reflect the taller building limits in the area of 4-5 storeys; a setback to facilitate views to the escarpment beyond and which 'eases' the relationship with neighbouring 1-2 storey development to the north; and, any taller development to the western parts of the Site should be modulated to avoid presenting a visual barrier against the escarpment and ridge."

22. Regarding levels and topography from The Terrace to East Lane the report states:8

"The change in level is not consistent and the contour drawing at Figure 12 describes the complexities of the rising ground condition. Five significant level changes occur."

And:

"The implications for the Site and any subsequent development would be to utilise the lower platform as an efficient building area whilst recognising the need for a set back and open space to the street edge. A key urban design consideration would be to define building form and mass that best responds to the slope condition and that has the potential to connect beyond the Site into the wider context of the Kelburn campus."

⁵ Page 9, 4th paragraph.

⁶ Page 11, 5th paragraph.

⁷ Page 13, 6th paragraph.

⁸ Page 15, 3rd and 4th paragraphs.

- 23. Regarding connections the report states:9
 - "Figure 14 identifies, diagrammatically, the potential location of a connection point to The Terrace (informed by existing access and levels) and link options (1, 2, 3) through to Wai-te-Ata Road."
- 24. Based on the urban design analysis, ten key principles were identified to which any future development of the Site should respond. These include (abridged):
 - (a) New gateway establish a high quality front door for VUW that links to the city.
 - (b) Character transitionary relating to both residential and VUW contexts.
 - (c) Topography and alignment work with contours utilising building forms both along and across contours, the latter to facilitate access. Reflect the natural slope and avoid creating large artificial datums.
 - (d) Connections and access linking The Terrace to Wai-te-ata Road to Main Campus.
 - (e) Built form, height and massing potential for 4 storeys at The Terrace frontage and a possible setback to define forecourt and entry space. Control façade lengths to 30m to ensure articulation, step heights and massing up and across the site east to west. Site-specific standards.
 - (f) Open space consider a primary forecourt space at The Terrace edge, a sequence of active open spaces, integrate mature planting/ re-vegetate.
 - (g) Views structure recognise identified short, medium, long range (negligible) views with visual connections to the escarpment.

8

⁹ Page 17, 3rd paragraph.

- (h) Entrances and entrance spaces clearly visible, oriented onto The Terrace and (for upper level entrances) onto access routes and spaces.
- (i) Elevated secondary open spaces linked to access routes and connections into buildings, provide views out to the city.
- (j) Active building edges provide for: façade transparency at ground, entrances, orientation onto spaces, routes and The Terrace.

Urban Design Report influences on PC81 as Initially Sought

- 25. PC 81 provisions as initially sought were informed by a range of factors including those identified in my urban design report above.
 Specifically, the provisions relating to: a) permitted building standards; and, b) the assessment criteria represented within the VUW Design Guide (as the basis of assessment for Discretionary Activity Restricted status) for development on 320 The Terrace.
- 26. Permitted building standards for the Site (Appendix 2 of the PC81 original documents), identified five key areas of control to deliver good urban design outcomes for the Site, as outlined below.

Building Height

- (a) Permitted height of 10m, consistent with the current height limit for the Inner Residential zoning, except for specific areas within the Site where greater height would be appropriate in relation to both the amenity of neighbouring residential areas and VUW accommodation needs.
- (b) The 10m height limit is deployed along The Terrace frontage within a zone set 20m back from the street edge. This ensures compatibility of any future building with the height of adjoining permitted development, maintaining a consistent street scale for The Terrace. The 10m limit is also retained to the northern part of the Site ensuring the continuation of amenity for nearby dwellings (No. 2 Maurice Tce). Elsewhere across the Site three 'stepping' height limits are proposed (56.5, 72 and 80 AMSL)

- from east to west (note an average datum at street level is 35.7 AMSL).
- (c) The urban design outcome sought by this approach is to avoid large, monotonous single building forms, to encourage massing that steps up the slope providing modulation and to minimise overshadowing over the boundary along the southern edge of the Site.
- (d) The 56.5 AMSL limit is largely contained to the lower 'platform' area on which the current Gordon Wilson building is located. This limit would generally allow for a building of circa 20m in height / 5 storeys. The northern boundary of the 56.5 AMSL limit follows a line parallel to the site contours but kept away from the property at No. 2 Maurice Tce to address juxtaposition in scale. The southern boundary of the 56.5 AMSL limit is the Site boundary where the rising ground level is such that a 56.5 AMSL limit would only allow a circa 0-3 storey building and this is extended some 25m (north) into the Site limiting building height within that area.
- (e) Further west (upslope) and, closer to the VUW Main Campus but away from the residential boundary a height limit of 72 AMSL is proposed. In this location the limit allows for a building up to 35m / 9 storeys that creates a 'stepping up' from the 56.5 limit.
- (f) The 80 AMSL limit is then located in the area closest to the VUW Main Campus and on the knoll formed by the contours in that area. Further, the recession planes standard significantly moderates any form along that part of southern boundary where the 80AMSL applies. This continues the townscape approach of stepping up and across the escarpment, but also allowing a building to provide a positive and visible frontage onto Wai-te-Ata Road.

Site coverage

(g) Permitted coverage of 50% is proposed compatible with the Inner Residential Zone. This encourages half of the Site to

remain as open space avoiding the perception of overdevelopment in the local context and ensuring the opportunity for visual and physical (access) links to the escarpment.

Recession Planes

(h) As above the Inner Residential Zone recession planes standard is proposed to apply that protects the amenity of neighbouring dwellings and moderates the areas where greater height may occur through the proposed heights standard.

Yards

(i) A 5 m side yard is proposed (note Inner Residential Zone has no side yard requirement) to the boundaries with the Inner Residential Zone. This would ensure a sufficient buffer to neighbouring dwellings in conjunction with the recession planes.

Building Length

- (j) A standard restricting the length of buildings along the northern and southern residential boundaries is proposed. The urban design intent of this standard is to ensure that buildings facing those boundaries are sufficiently articulated and modulated to avoid presenting unrelieved, monotonous and overly long facades to neighbours.
- 27. Minor Revisions to the VUW Design Guide have been proposed within the Plan Change. The changes have been driven by urban design considerations and principally affect the content of the existing Guidelines under 'Massing'. The Objectives remain unchanged. I will not repeat those changes but rather state that they have been revised to include 320 The Terrace within Area 1 of the Main Campus section of the guide and the revisions under 'Massing' seek to acknowledge the different topographical and grid patterns.

Urban Design Assessment – Memo 30 June 2015

28. I will not repeat the findings of my 30 June assessment (Appendix 8 to the PC 81 Application) other than to confirm these key conclusions:

"Overall the proposed standards will result in protection of residential amenity along the side boundaries through application of the Operative District Plan's Inner Residential building recession plane controls (5.6.2.8) on the site."

"In addition to these, further control is proposed on the quality of visual amenity / outlook for adjoining dwellings through a maximum 30m continuous building length standard ... The effect of this proposed control, when combined with the building recession plane standard and proposed 5m yard standard, will be to ensure no overly large, out of scale, unrelieved facades will be created that may present an onerous or unpleasant setting for adjacent dwellings."

"Building heights have been defined according to the Inner Residential 10m limit with variation to sensibly reflect the steep topography and requirement for VUW's development needs...."

"Taller VUW-scale buildings closer to the upper VUW Main Campus at a combination of 72 and 80 AMSL. The specific location of these height areas have been set to minimise any additional overshadowing over neighbouring properties or their usable private outdoor spaces compared to the existing Inner Residential building standards."

"The DPC proposes that the "design, external appearance, siting and site landscaping" of new buildings on 320 The Terrace is to be assessed using the resource consent process. This is consistent with other Areas where design control is exercised by the Council through District Plan provisions (i.e. Central Area, Business Areas, Centres etc)."

"The proposed permitted building standards will support positive built form and open space outcomes in relation to VUWDG objectives and guidelines relating to massing, scale, skyline, views and elevation modelling."

"Good design outcomes, particularly in relation to skyline, views and elevation modelling, will be dependent upon the preparation of an appropriate design brief for future new buildings on the site."

"Overall the proposed permitted building standards, proposed building design control, and modified VUWDG are supported from an urban design perspective."

SUBSEQUENT REFINEMENTS

- 29. I attended a PC 81 meeting with Council Officers and other members of the VUW Plan Change consultant team on 4th November 2015. That meeting focused on addressing the initial comments by Council Officers.
- 30. An email identifying further refinements was circulated by Council Officer Daniel Batley on 4th November 2015. That email identified a range of matters, a number of which related to urban design. Those matters included:
 - (a) Definition of additional key viewpoints of the Site and the inclusion of simulated development form superimposed on those views. In response to this request a plan identifying all key views was developed by the consultant team and a drawing prepared by Athfield Architects Limited was approved by WCC. The relevant plans are attached to this statement as Appendix 2.
 - (b) Additional Objectives and Guidelines relating specifically to: ensuring views onto the (unbuilt parts of) escarpment; revegetation of landscape areas; breaking down the mass of built form such that it 'steps' up and across the site, and modulation / maximum length of buildings facing The Terrace and elsewhere. In response to this request further Objectives and Guidelines were developed and a revised VUW Design Guide prepared (Appendix 3 to this statement). The key additions included:
 - (i) Massing Objective 06: To promote a balanced relationship between buildings and open space on the escarpment on 320 The Terrace that avoids the domination of built form over open space.
 - (ii) Open space and Landscape Objective 1: To develop a high quality landscape on 320 The Terrace, recognising the prominence of VUW's elevated position in the city-scape, including the visibility of the vegetated escarpment.

(iii) Massing Guideline G11: Any building mass on 320 The Terrace that faces The Terrace and runs longitudinally with the Terrace alignment (NNE-SSW) should achieve the following outcomes:

Avoid the appearance of overly long and dominant forms and facades by restricting the maximum continuous length of the form/façade along any single building line to 30m.

Longer building forms/facades if proposed should include a visually significant step in the building line, emphasised by a similar articulation at the roof and eave lines.

- (iv) Massing Guideline G12: Break down the mass of any buildings on 320 The Terrace by stepping forms down and across the site.
- (v) Circulation and Connection Guideline G3: Promote connections between the Kelburn Campus and The Terrace by facilitating a new university 'front door' and link to the city through 320 The Terrace.
- (vi) Open Space and Landscape Guidelines G1-G3: Addressing several matters including views onto the vegetated escarpment and re-vegetation by native species.

MATTERS RAISED IN SUBMISSIONS

31. I have read all the submissions and further submissions. I note the majority of matters raised by submitters do not relate to urban design, however a small number of submissions do raise issues that I comment on as follows.

Submitter number 21 (Ken Davis)

32. Mr Davis states that he would support the zone change only if the Gordon Wilson Building is retained. He also states the zone change in

the context of facilitating a positive link between the city and the Kelburn campus. I would comment that were the GWF to be retained a positive link would be unable to be achieved given the position of the GWF that effectively blocks the Site between The Terrace and the upper campus.

Submitter number 24 (Living Streets Aotearoa)

- 33. The submitter supports the University's intention to have a pedestrian link through the site so that The Terrace is connected to the main Campus. They also seek that the bush area on the upper part of the site be preserved as far as possible to maintain the amenity of this area.
- 34. In relation to these points I would comment that the provision of a publicly accessible link is supported by PC81. This link may include vertical access within buildings but also could be provided as a pedestrian or shared surface pathway. Initial investigations identified potential routes along and across contours that confirmed such links would be possible. With regard to bush preservation I note that PC81 allows for 50% of the Site to remain as open space that would include vegetated areas.
- 35. The final disposition of built form and open space has not been determined however the guidelines (as revised following WCC discussions 4th November) proposed within PC81 identify a number of outcomes that should be achieved to ensure re-vegetation of open space with appropriate native species (G3), a balanced relationship between buildings and opens space (06), a stepping of forms (G12), and providing views of the escarpment (G2). The amenity of this area (as noted by the submitter) is entirely visual with no formal access at present. PC81 will open up access to this area and therefore enhance the level of amenity it provides.

Submitter number 29 (Paul Lee)

36. Mr Lee is concerned about traffic access to the Site as well as pedestrian access. His concerns have been addressed in the evidence of Mr Coop at his paragraph 38 where he states "that it was not possible for the University to include in Plan Change 81 a specific pedestrian and traffic design" and I defer to Mr Coop's position.

Submitter number 33 (Fernhill Body Corporate)

37. The Body Corporate identifies concerns over building setback and height. They request a 15m side yard to the southern boundary where residential areas exist over the boundary and a height limit of 30 AMSL beyond that setback.

38. I disagree because:

- (a) A 30 AMSL is I believe an error as this would locate a maximum height plane below the level of the ground across much of the area in question.
- (b) By comparison the 56.5 AMSL is already partly below ground along the southern boundary and elsewhere provides a maximum built height above ground of 5m to 13m (effectively 1 to 3 storeys that is entirely compatible with a residential scale over the boundary).
- (c) The Officer's report (urban design review Attachment C) notes at page 2, 2nd, 3rd and 4th bullets from top that:

"The 56.5m zone which hits the contours along the southern boundary, effectively excluding building from a part of the site"

"The 72 AMSL zone is set back from the boundaries with residential properties by at least 15m"

"The 45 degree recession plane along the southern boundary will prevent taller buildings being located close to residential properties".

I agree with the Officer's conclusions and am comfortable with the PC81 recommended heights in this area.

(d) The current Inner Residential Zone controls do not require any side yard but rely on recession planes and a maximum 10m height to protect sunlight access. Proposed PC81 adopts the recession plane standard and adds in a 5m side yard

requirement along residential boundaries thereby increasing the level of amenity protection. The proposed PC81 56.5 AMSL height plane again improves on the current Inner residential standard (10m above ground) in the area adjacent to existing dwellings at 324 The Tce, as it results in maximum building heights in that area of 0-5m. Further up the slope (west) and away from those dwellings where the 320 The Tce site boundary adjoins vegetated bank (not dwellings) the proposed height plane increases to 80 AMSL, however in this area the ground level is such that the maximum height above ground ranges from 10m to 16m while the recession plane and side yard significantly moderates built volume within approx. 25m of the boundary, and mitigates any shading that may occur.

(e) Finally I note the findings from the Officer's report (urban design Attachment C) that states at page 2 "I consider the proposed heights appropriate for the following reasons: they maintain the amenity (sunlight and privacy) of residential neighbours".

OFFICERS' REPORT

- 39. I have read the Officer's report and the urban design report at Attachment C and generally agree with its recommendations apart from the proposed additional design guideline G4 that states:

 "Minimise encroachment by buildings into the area of vegetated escarpment visible from Ghuznee Street".
- 40. I disagree with this guideline because the area of vegetated escarpment in the views defined by Ms Desrosiers (Appendix 1 of her report) include a large portion of escarpment that falls outside of the Site boundary (image below indicates the majority of visible vegetated bank on axis with Ghuznee Street sits above and west of 324 the Tce not 320 The Tce). It is therefore unclear what portion of the vegetated escarpment is to be the subject of the assessment and further that were the GWF to be demolished how would the new revealed area of escarpment be reconciled.



41. I believe that the guidelines as proposed in PC81 under Open Space (G1, G2 and G3) together will more appropriately address the outcomes Ms Desrosiers is seeking. The guidelines are:

G1: Provide for the visibility of the vegetated escarpment between The Terrace and the campus ridgeline from the city by encouraging glimpsed views and view shafts between and over buildings onto areas of open green space.

G2: Provide for views of the escarpment from Ghuznee Street, MacDonald Crescent and The Terrace by providing for visual connections onto upper level vegetated areas.

G3: Progressively improve the landscape quality of the vegetated escarpment by removal of weeds and weed species trees and revegetate with appropriate native species.

42. The above guidelines together with the 50% site coverage standard and other massing guidelines that seek a stepping of forms and a balance of built-to-open space, will ensure views onto vegetated areas will occur.

CONCLUSION

- 43. PC81 has been informed by a thorough and robust urban design approach based on assessments of the Site and its context. These detailed studies have led to PC81 site-specific proposed building standards and revisions to the relevant VUW Design Guide.
- 44. Important urban design outcomes for the Site include opening up safe connections between the city and the Kelburn campus,

regenerating a currently derelict part of The Terrace, activating the street edge, improving the quality of the vegetated escarpment as a city backdrop and developing a land use mix compatible with residential neighbours demonstrated elsewhere at the campus edges.

- 45. The amenity of adjoining residential areas will be protected, a matter agreed by Ms Desrosiers in the Officer's report through the proposed building standards.
- 46. For the above reasons I support the PC81 proposals from an urban design perspective.

OHL.

ANDREW DAVIES BURNS
1 December 2015