

**BEFORE INDEPENDENT HEARING COMMISSIONERS
IN WELLINGTON CITY**

**TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE
TĀONE O TE WHANGANUI-A-TARA**

IN THE MATTER of the Resource Management Act 1991
AND
IN THE MATTER of the hearing of submissions on the Wellington
City Proposed District Plan

HEARING TOPIC: Hearing 2 - Residential

**STATEMENT OF PRIMARY EVIDENCE OF NICHOLAS JAMES RAE
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

(URBAN DESIGN)

FINAL EVIDENCE – 17 MARCH 2023

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1. INTRODUCTION

- 1.1 My full name is Nicholas James Rae. I am an Urban Designer and Landscape Architect. I am the Director of Transurban Limited, consultants on urban development. I hold a Master of Urban Design from the University of Sydney and a Bachelor of Landscape Architecture (Honours) degree from Lincoln University. I have approximately 23 years' experience in this field in New Zealand, the United Kingdom, France, Portugal, Saudi Arabia, and Australia.
- 1.2 My experience and qualifications are set out in my statement of evidence for Hearing Stream 1.

Involvement with Kāinga Ora Submission

- 1.3 I have been retained by Kāinga Ora – Homes and Communities (**Kāinga Ora**) to provide urban design advice and supporting evidence relating to the plan changes notified by the five district Councils in Wellington dealing with the application of the Medium Density Residential Standards (**MDRS**) and the National Policy Statement on Urban Development (**NPS-UD**). This is to ensure a consistent approach is applied where possible to the Wellington Region, understanding the relationships between the different districts.
- 1.4 I was instructed in July 2022 and undertook site investigations in August to assist with the preparation of the submissions particularly on the matters of walkable catchments, role and scale of centres, zone opportunities provision testing. I was assisted by Fabio Namiki (registered architect) of my office in our work. I had no involvement with the preparations of further submissions.
- 1.5 I have visited the Wellington District over a two day period on 11 and 12 August 2022 where I visited locations on the public road network and reserves. This included significant time walking the central area of Wellington, Newtown, Mt Victoria, Mt Cook, and Kelburn to experience the existing urban fabric from a pedestrian perspective and to investigate recent developments.

1.6 I also undertook a site visit with Mr Mike Cullen on 16 January 2023 where we focused on the centres in the Wellington region to assist with the consideration on the role and form of these.

Evidence of other experts

1.7 I rely on the evidence of Mr Liggett, who sets out why Kāinga Ora is involved in this plan review process. Importantly from my perspective, the Kāinga Ora focus is not on individual land holdings owned by Kāinga Ora, but rather focus on urban development outcomes more generally across Wellington City, as well as providing for a consistent planning policy across the Wellington Region and Aotearoa that enables well-functioning urban environments and the opportunity for growth and intensification of our cities with ease and confidence.

1.8 Where appropriate and relevant, my evidence will reference and rely on the evidence of Mr Matt Heale, Ms Victoria Woodbridge and Mr Michael Cullen.

1.9 I have reviewed and reference relevant parts of the section 42A Reports, and the statement of evidence of Ms Orla Hammond (walking speed and catchments) for hearing stream 1, and Mr Zamani, and the section 32 report Part 2: Character Precincts and the Mt Victoria North Townscape Precinct.

Code of Conduct

1.10 Although this is a Council hearing, I have read the Environment Court's Code of Conduct for Expert Witnesses within Practice Note 2023, and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this statement of evidence are 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.

Scope of Evidence

1.11 My evidence will address and is organised by the following matters:

- (a) Statutory context;
- (b) Walkable Catchment methodology update;

- (c) Application of zones;
- (d) Design Standards
- (e) Commercial at Ground Floor;
- (f) Character Precincts;
- (g) Design Guidelines.

2. STATUTORY CONTEXT

2.1 I have reviewed and rely on the statutory context set out in Mr Heale's and Ms Woodbridge's evidence.

3. WALKABLE CATCHMENT METHODOLOGY UPDATE

3.1 As outlined in my evidence for Hearing Stream 1 in relation to walkable catchments, I consider the following key principles influence my position:

- (a) Enable the maximum residential opportunity in addition to commercial and community facilities within centres which are generally on the flatter land;
- (b) Enable high density residential around the centres focusing on the flatter land opportunities generally responsive to applying a walkable catchment starting principle of:
 - (i) 15 minutes (1,200m) from the edge of the City Centre zone and apply the High Density Residential zone within;
 - (ii) 10 minutes (800m) from the edge of the Metropolitan Centres and Town Centres, and from Rapid Transit Services and apply the High Density Residential zone within;
- (c) Within the High Density Residential zone (**HRZ**) determined above, enable greater residential density with provisions to achieve a planned urban built form transitioning through heights of 8, 10 and 12 storeys applied as appropriate in

response to the different (higher) planned heights of centres, generally within 400m of the (proposed) Town Centres and 400-800m of the Metropolitan Centres, and the City Centre;

- (d) Enable greater residential density with provisions for 5 storeys within a 5 minute (400m) catchment from the edge of some Local Centres and apply the Medium Density Residential zone (**MRZ**) within;
- (e) Opportunities for increased residential density should favour centres over RTS stations. However, where both exist, the RTS stations provide access to other centres which supports greater intensification;
- (f) Refinement of walkable catchments or the application of the HRZ to larger areas should respond to the existing and potential future attributes of the location, but with a preference for an enlarged area at good locations in response to providing more opportunity than the minimum expectations set out in the NPS-UD.

Expansion or retraction

3.2 The attributes that support the expansion of the HRZ that I consider to be important (and are consistent with the MfE guidance)¹ are listed below. However, I consider not all of these attributes must be present to justify the expansion of the HRZ as this is a plan for growth:

- (a) Well-connected high permeability areas including connections with pedestrian stairs;
- (b) Streets with good infrastructure (footpaths, cycle lanes);
- (c) Flat or low gradient areas;
- (d) Consistent built-form response to landform, or connections between elements;
- (e) Access to recreation or sports reserves;

¹ Statement of evidence N. Rae Hearing Stream 1, Para 6.16 -6.17.

- (f) Proximity to community and education facilities;
- (g) Proximity to commercial activities;
- (h) High amenity values (views, natural environment);
- (i) High (re)development opportunities (low value housing stock);
- (j) Continuation of the urban fabric; and
- (k) Range of transport modes.

3.3 Likewise, a reduction in a catchment size (and therefore the application of the HRZ) may be appropriate where the ability to achieve a walkable environment is very constrained with safety issues and urban fabric discontinuity. These elements include:

- (a) Poorly connected areas separated by open spaces or natural features such as cliffs and rivers, or infrastructure such as motorways and railways;
- (b) Consistent built form response to landform;
- (c) Narrow streets (<12m), or where pedestrian connectivity is poor and hard to achieve in the future;
- (d) Streets steeper than 11° (1:5) 20%; and with consideration of street gradients above 12.5%² except where stairs are provided;
- (e) Low (re)development opportunities (high value housing stock);
- (f) High coastal hazards such as inundation and tsunami risk (avoid high risk areas; manage in medium risk areas);

3.4 Some of the challenges when undertaking this analysis include consideration of areas that might be within a walkable distance. However, the high tsunami risk overlay would exclude zoning higher density. This zoning therefore relies on the accuracy of the risk mapping. In places like Kilbirnie or Island Bay, it is difficult to see on

² 12.5% gradient is the steepest anticipated for a new road provided for in Section 329(1) Local Government Act 1974, unless fixed by any operative district scheme or bylaw or resolution of the Council. There are existing streets steeper than this.

the street where the boundary of this risk would fall, particularly on streets that are very flat and the risk mapping covers only a portion of the street. Other locations in Island Bay which would potentially be walkable to many people in close proximity to the centre are also excluded due to the steepness of streets. I reiterate my comment Hearing Stream 1 - there are many variables and defining walkable catchments for zoning is not an exact science.

- 3.5 For flatter areas like these around Tawa, the expansion of the walkable catchment makes sense due to good walking opportunities. However, this is a smaller centre than the Kilbirnie Metropolitan Centre where the catchment is reduced. This is why there is a good opportunity for Tawa to grow as a centre along with a supporting growing population. In Kilbirnie, the opportunity to provide density to support its function could therefore be through higher built form rather than a wider catchment due to the constraints. The same applies to the City Centre where there are land area constraints.
- 3.6 In Wellington, Porirua and Kāpiti, the walkable catchments tend to favour one side of a centre or RTS due to the barrier effect of railways and motorways with limited connections. The expansion and reduction of the catchments has considered these elements which might support a larger area to one side, even if further than the catchment principle, where good opportunities are provided and assist in enabling an overall residential population at those locations considering the lost opportunities due to the barrier.
- 3.7 The consideration of street gradients for determining catchment expansion or retraction is difficult in Wellington due to the gradients of existing streets in very close proximity to the City Centre where high density opportunities are considered appropriate for other beneficial reasons. Street with gradients of more than 12.5% (1m in 8m) need careful consideration as this is considered steep from a walking perspective. Ideally, gradients are less than 5% (1:20) as it is considered to be relatively flat and provides for universal access, not just walking.
- 3.8 The walkability of an area will change over time and by enabling development in areas this may also trigger public infrastructure

enhancement (street upgrades, pedestrian bridges etc) to be enhanced. Growth of a residential population may also trigger the development of further commercial and community services. An example of this is at Crofton Downs where the topography is a considerable constraint. However, the train station is supported by a supermarket and hardware store, a primary school and recreational opportunities. The car parking around the station could be developed to include additional services for example.

4. APPLICATION OF ZONES

- 4.1 I have, together with colleagues from my office, considered the application of the HRZ in the Kāinga Ora submission maps using the methodology I have set out above. This included a critical review of the areas together to ensure a robust outcome. This work, together with wider discussions and considerations I have undertaken for the Porirua and the Kāpiti Coast IPI processes has further solidified my thinking that we should be maximising the residential development potential on flat land as a priority **in and around centres and rapid transit stations** as I consider these are the best and most likely locations for development. This means the potential for additional height in some of these areas is a very important consideration to achieve this outcome, rather than expanding to areas where less of the supporting attributes exist as highlighted above, or have the potential to be enhanced or provided in the future.
- 4.2 This process has generally resulted in my support for a reduced application of the HRZ compared to the Kāinga Ora submission. My recommended application of the HRZ is set out on the maps included in **Attachment C**. These maps are provided as a recommendation from an urban design perspective in response to the NPS-UD requirements and consideration of submissions by Kāinga Ora. There may be other factors that might result in further adjustments, such as the decision on zoning application in Kilbirnie due to inundation and tsunami risk that the reporting planner for Hearing Stream 1 has set out, or the best methods for managing character areas. Due to the scale of this task, I consider further refinements may be necessary to reach a final mapping position.

- 4.3 In addition, I also qualify this recommendation with the following. Kāinga Ora did not seek to reduce the application of the HRZ as notified in the PDP, therefore the HRZ areas as proposed by the Section 42A are included in the maps in **Attachment C**.
- 4.4 Through our analysis we have identified some parts zoned HRZ as recommended in the Section 42A that do not meet the above criteria, and are not the best locations for higher density. For example, the area to the east of the motorway at Johnsonville in the area accessed from Chesterton Street, Sheridan Terrace and Cresswell Place, Chapman Street, Slone Terrace, and the eastern part of Stewart Drive. These areas are within the 800m walkable catchment, however this relies on a very poor pedestrian access from Disraeli Street through an underpass under the motorway and then a zig zag path up a steep hill where there is no passive surveillance. In addition, parts of the streets are steep, but also with poor connections.
- 4.5 I recommend refinement of the zone application should apply to the Section 42A HRZ recommended areas also.
- 4.6 The application of the zones is also not based on whether a character precinct applies. If aspects of the zone are not appropriate or need to be managed different, the precinct / overlay should do this. Obviously, how this is decided relates to the planning issue of the Character Precincts and the zoning method could be subject this to this.
- 4.7 For clarity, the maps include a red hatch over areas which are proposed to have a more enabling height standard as recommended by the Section 42A. This is not how the Council have illustrated this outcome as they just label the maps with a number. Where there are areas of expansion over those areas recommended by Section 42A for the different heights, these have been identified in blue. The change to the height in those areas is then provided. So there is an increase to the Section 42A and in some areas an increase in the spatial extent consistent with the submission.

5. PLANNED URBAN BUILT CHARACTER

- 5.1 The design standards of a particular zone are just as important as the spatial extent of zones. This is because the building envelope

provided by the design standards will determine the development opportunities for a particular site or a neighbouring site where the interface occurs, for example development in the HRZ is potentially constrained by the HIRB at the boundary with the MRZ.

- 5.2 The HIRB standards play a big role in the built form opportunities, and in achieving height and bulk on sites. The more restrictive the HIRB standards are, the larger the site needs to be in order to achieve taller buildings. The application of more restrictive HIRB standards is likely to require the amalgamation of additional sites in order to achieve the maximum build height standard. Relying on site amalgamation is problematic as this requires alignment of property acquisition at the right times which is not always possible/feasible. In my opinion, the lower the number of sites that need to be amalgamated lowers the risk of not achieving redevelopment outcomes as sought, and opens the market to a greater number of developers through lower up front costs.
- 5.3 I understand there is general alignment between the reporting officer and Mr Heale on the bulk and location standards in the MRZ with some adjustments.
- 5.4 The main difference of opinion between the reporting officer and Mr Heale lies with the provisions in the HRZ, where there are effectively two different planned outcomes proposed as determined by the bulk and location standards.
- 5.5 Both options have merit from an urban design perspective. However, Mr Heale's approach would enable at least 6 storey buildings to be built along the street with potential for a consistency of height and façade to the street, such as illustrated in Attachment B, SK04. This is a more 'urban' outcome not dissimilar to the form of taller buildings along Oriental Parade where buildings are close together, face the street (and the high amenity of the waterfront) with limited to no side interactions.
- 5.6 However, I pose the question: is this a desirable outcome in the HRZ? In my opinion it is, and it is also a good way to achieve taller buildings in the best locations where density can be maximised, while retaining some of the important aspects such as good outlook (not just the

minimum), good sun access, and open space opportunities where trees and vegetation on a site can assist with amenity values, shade and stormwater management.

- 5.7 A similar outcome is also enabled by the Section 42A option, where say the three sites on one side of the street in Attachment B, SK03 are amalgamated and the internal HIRB would not apply resulting in a potential bulk in relation to the street as illustrated by the red line in Figure 1 below. The different then is whether the stepped interface outcome is required at the boundary to a neighbouring property. I consider this unnecessary in the HRZ.

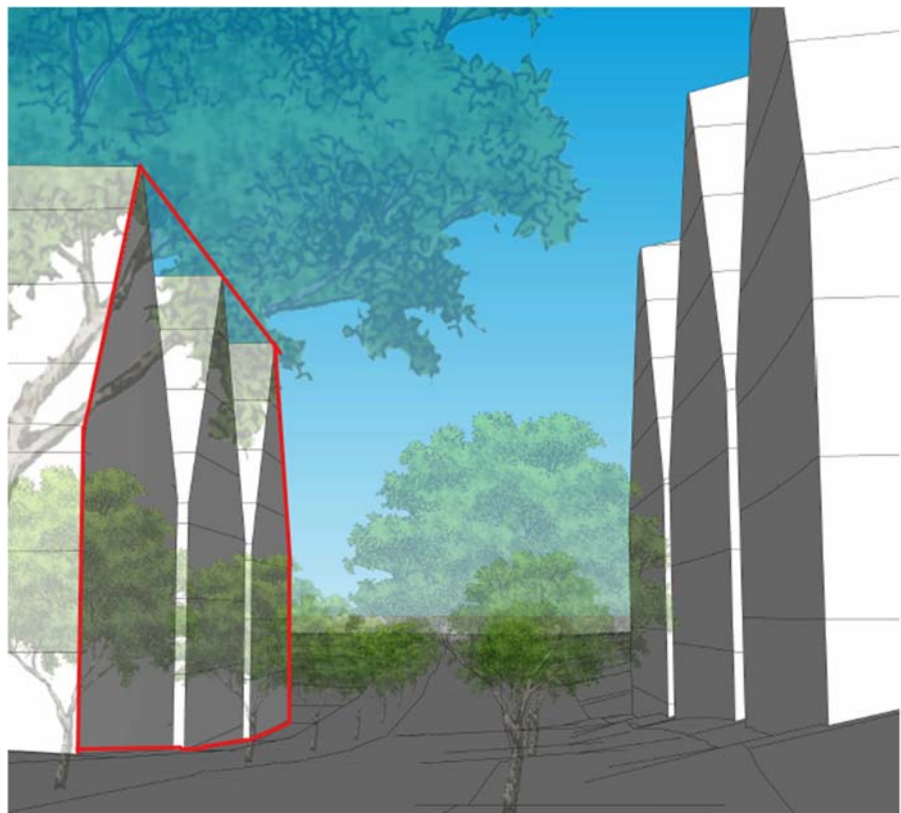


Figure 1 - An example of the bulk envelope of a site that is the result of amalgamating three sites, based on Attachment C, SK03.

- 5.8 I consider that the HRZ should be different to the outcome in centres where an even more 'built' urban form should exist with vegetation provided in streets and open spaces. In centres, the provision of onsite landscape and open space is not expected.
- 5.9 The reporting officer's recommendation provides for an outcome that encourages more space or gaps in the built form along streets where multiple developments occur. Applying this approach would result in

an overall built form that encloses the street to a lesser degree – an outcome I consider to be less than ideal for a high density environment. However, I consider the reporting officer's recommended approach could result in the same outcome as Mr Heale's approach (and my preferred approach) if that same street was developed by one party as one big development where the HIRB standards would not apply to the internal boundaries. However, the likelihood of this being achieved is relatively slim.

- 5.10 Some of the most interesting streets have been developed overtime with a similar form but with varied architecture. This outcome is enabled in both options, however, is it less likely this desired outcome would occur if the street was developed through the use of a single large site as typically the architecture is very similar in such developments.
- 5.11 Arguably the objectives and policies could be achieved through the application of either option, and it is likely that a stepped outcome would also be achieved in Mr Heale's version.
- 5.12 The reporting officer's recommended policies refer to the residential design guide. However, I note that the only diagrams within this guide that might provide some guidance as to the planned urban built form in the HRZ is on page 15 under G23.
- 5.13 These diagrams are of three storey buildings, so not of the "at least 6 storey" built form outcome. Despite this, the diagrams do illustrate an outcome with vertical side walls close to boundaries. I support this outcome for three storey buildings.
- 5.14 However, assuming this illustrates a development with more than 3 units with HRZ applying to the site and neighbours, the Council's HIRB of 8m+60° would apply, resulting in a side wall maximum height of 9.7m if the side setback is 1m. Taller buildings would be required to setback any additional floors from the boundary, resulting in the stepped outcome along the frontage and limited additional height on the rear of the site due to the HIRB applying along the full length of the rear boundary.

- 5.15 Alternatively, Mr Heale's option provides for effectively a doubling in height of the front building with vertical sides resulting in a 6 storey building. I consider this outcome to be appropriate as it enables at least 6 storeys (therefore giving effect to HRZ-O1), is of a greater density and scale than the MRZ and contributes positively to a more intensive high density urban living environment (giving effect to HRZ-O2) to achieve the strategic objectives of a compact urban form (giving effect to CC-O3, SCA-O2(2), UFD-O1, UFD-O3).
- 5.16 I consider that the planned urban built character is not that prescriptive. However, I do consider there is a clear policy direction that buildings of at least 6 storeys are enabled in this zone. The opportunity for buildings of this scale should be enabled with a preference at the front of sites, where they can abut one another without recession planes. The older urban fabric of parts of Wellington have outcomes whereby buildings sit close to one another along a street without such side yard set backs. I acknowledge these are lower height buildings. However, these were designed with the same principles of facing the street and to the rear with limited to no windows in side walls with a similar scale along the street.
- 5.17 Many other different forms are also enabled by either option, including single storey detached houses in the HRZ, which arguably do not achieve the objective for this high density zone.
- 5.18 I consider the standards need to be selected based on providing the most appropriate methodology to manage or achieve the outcome, rather than defining the outcome.

6. DESIGN STANDARDS

- 6.1 If it is considered that the planned urban built character of the HRZ is a high density zone, with a high bulk and scale of buildings as proposed by Kāinga Ora, the development standards need to be designed to achieve this outcome.
- 6.2 However, in contrast, I consider the development standards as recommended by the reporting officer would achieve the lower density / lower bulk outcome.

6.3 It is somewhat difficult to develop standards without confirmation of the outcome sought. However, I discuss below each of the standards that Kāinga Ora has sought to change, assuming the higher bulk option is favourable:

General Height Standard in HRZ

6.4 The recommendation within the Appendix A of the section 42A report for HRZ-S1 provides more height than is required by the MDRS for up to three units, which could enable four storeys at 14m +1m for roof form with a 15° pitch or more. This supports a greater opportunity as a permitted activity than the MDRS. However, the design outcome of buildings utilising this provision relies only on the standards required to be met to achieve policy HRZ-P8 (contribute positively to a changing urban environment, attractive and safe streets and buildings respond to the context). There is no standard that requires a response to the existing or planned context. This risk is managed to a degree as the built form will be relatively small as it will contain up to three dwellings only. This additional height recommended may be trumped on small sites ($\leq 11.5\text{m}$ wide) by the HIRB HRZ-S3 standard of 4m+60°. However, the additional height provides for greater flexibility and expectation of potential bulk, which I support.

6.5 To provide for 6 storey buildings, the reporting officer has recommended HRZ-S2 includes a height standard of 21m, however, 50% of a building's roof at a slope of 15° or more can exceed this. Typically, when this standard used elsewhere in other district plans it includes an additional 1m for this roof. Kāinga Ora sought a similar standard of 22m plus 1m for the roof form with the same 15° slope requirements.

6.6 I consider that the recommended standard in the section 42A report provides a very similar outcome with flexibility for roof forms and enables flexibility for floor to floor heights and topography undulations. The Kāinga Ora submission would provide for slightly greater flexibility, however I consider the section 42A recommended standard achieves the intent sought. Buildings utilising this height provision will require a resource consent (HRZ-R14) which also enables the height standard

to be 25% greater than the standard (26.25m total), noting that HRZ-R14(3) refers to matters of discretion in HRZ-P13.

- 6.7 The matters for discretion include what I understand in HRZ-P12 “City Outcomes Contribution” as intended as an incentive for achieving other outcomes by enabling a building to have additional height. However, in combination with this, the matters in HRZ-S2 for non-compliance with height include streetscape and visual amenity effects, dominance, privacy and shading effects on adjoining site, effects on open space and wind effects and also need to be assessed along side. There are no specific guidelines on taller buildings other than I assume higher buildings will need to be justified through a context analysis in G1 and G2 (which I note does not include the statutory context, where I consider it should so it can relate to the planned outcome), and with regard to Vegetation and Planting G3, G5.³
- 6.8 This framework confirms to me that some additional height (5.25m) or around 8 storeys (total) in the HRZ is provided for by the reporting planner subject to assessment. This might occur anywhere supported by the right context. However, the proposal to specify areas where additional height is appropriate such as submitted by Kāinga Ora 8, 10 and 12 storeys, would provide clear guidance that the height outcome is desirable in the right locations and provides certainty of scale for developers and the community. These heights can only be achieved through a consent with a well-designed building.

Additional height in HRZ

- 6.9 The Kāinga Ora submission sought to apply height variation controls over the HRZ at 29m (8 storeys), 36m (10 storeys) and 43m (12 storeys) in response to the height of centres, to enable more than the minimum 6 storeys required by the NPS-UD.⁴ The Kāinga Ora approach would therefore enable the potential for more density close to the centres supporting a compact outcome.

³ PART 4 – APPENDICES, DESIGN GUIDES AND SCHEDULES/Design Guides/ Residential Design Guide.

⁴ I note these heights have been determined using a 3.6m floor to floor distance which provides flexibility and roof forms.

- 6.10 Around the City Centre zone, the 12 storey provision was proposed which sits abutting the CCZ, extending within a 400m walkable catchment.
- 6.11 As an example, this generally applies to both sides of The Terrace south of Boulcott Street between the CCZ and Victoria University. The northern end of this area includes the existing Herbert Gardens building at 14 storeys and Jellicoe Towers at 15 storeys. Further south, the building form varies between 1 storey to 4 storeys, and has a collective historical character, where some are listed as heritage buildings including one next door to the Herbert Gardens building. I note the Operative Plan does not include any character precincts in this area. Refer to Attachment A for a high level comparison of block heights between the reporting planner and the alternative.
- 6.12 The proximity to the city provides a good opportunity for increased density even though the access is steep in places to transition down to Lambton Quay where lifts and steps are commonly used for access. The street character would be enabled to change, and this would occur even with 6 storey redevelopments. The taller height continues the existing built form at the north of The Terrace, and I consider this to be an appropriate outcome, particularly in relation to the bulk and scale of the CCZ. I note that the urban form of this central area also needs to be confirmed due to the Kāinga Ora submission on heights in the CCZ. I consider the above example of 12 storeys would be suitable along with the proposed similar height limits in the CCZ adjacent.
- 6.13 Kāinga Ora sought 43m (12 storeys) for land north west of the CCZ at Thorndon, both east and west of the motorway. Four buildings between 9 and 14 storeys exist to the west of the motorway within this area. It is at the base of the high western town belt providing a green back drop of significant scale defining the edge of the city centre which I consider can absorb 12 storey buildings.
- 6.14 The motorway could be argued that it is a barrier and reduces the potential permeability between the CCZ and land to the west, however there are regular over bridges (and some under) at roughly 300m spacings along the motorway which provide better access than other areas around the Johnsonville valley for example.

- 6.15 The reporting officer has recommended the area west of the motorway to be zoned MRZ, along with some character precincts, which would include the two taller buildings identified above. I do not agree with this approach.
- 6.16 With regard to Policy 3(c) of the NPS-UD, I consider this area should be zoned HRZ. The character of this area already includes taller buildings and excluding the character precinct areas, there are opportunities for higher density development. This may not result in much change initially due to the assumed value of the improvement on these sites being relatively high.
- 6.17 Further application of this height is included in the maps in **Attachment C**. Further refinement following detailed site by site investigation may be warranted given my assessment has not covered all areas in detail.
- 6.18 I also support the concept of a 10 storey height standard within 800m of the CCZ for similar reasons of enabling higher density outcomes close to the CCZ. However, I consider there are a number of areas where a 36m building height was proposed in the Kāinga Ora submission that I do not consider suitable for HRZ and therefore not suitable for 36m buildings.
- 6.19 For example, considering the area west of Victoria University along the ridge near Upland Road, the section 42A report recommends part of this area be zoned HRZ which would enable a change from the existing two to three level existing dwellings. The university zone enables 34m to 50m buildings and include 7 storey existing buildings which have more of a commercial character. I consider that enabling a 10 storey built form outcome in relationship to the University and the City Centre could be appropriate. However, the land further west from the ridge (east of Upland Road) is less suitable for further intensification.
- 6.20 Kāinga Ora sought an 8 storey 29m height standard for areas around the (proposed) Town Centre of Mirimar. I note that page 133 of the Kāinga Ora submission includes applying this around the Tawa centre as well. However, this was not included on the submitted maps. This

enables 2 additional storeys to the standard HRZ which can transition in height from the HRZ to the (proposed) Town Centre where 10 storeys (36m) are enabled. The application of this 8 storey height overlay in Mirimar responds to the connection function of Park Road linking the (proposed) Town Centre to the employment area to the north. This is a wide street lined with good sized pohutukawa trees serviced by a bus route and can absorb additional height and density. Further commercial activities could also establish along this street.

- 6.21 The additional height at these locations supports my earlier discussion where the intensification strategy might be to provide more density opportunity at higher heights but also to support the centre. The decision on the centres is therefore important in determining the surrounding zoning pattern.
- 6.22 The application of the HIRB standard in conjunction with the height standards or overlays are required to be considered together as the outcomes sought by additional height, is unlikely to be realised with a restrictive HIRB standard.

HIRB Alternative in HRZ

- 6.23 The reporting officer has recommended a HIRB standard of 4m+60° applies to three dwellings or less on a site. For more than three dwellings and retirement villages, a 8m+60° standard applies where the design of the building can be controlled through a consent process. A 5m+60° HIRB standard applies where these sites adjoin the MRZ, Wellington Town Belt zone, any heritage area or site containing a heritage building, any character precinct or any school site.
- 6.24 Modelling undertaken by my team demonstrates that the height in relation to boundary standard is the main height controlling provision in achieving taller buildings on existing narrow sites, rather than the height standard.
- 6.25 The modelling shows that to achieve 6 storeys applying a HIRB of 4m+60°, a site width of 19.67m (minimum) is required. However, this assumes only a 3.5m minimum wide top (6th) floor, or the width of one bedroom, 3.0m floor to floor heights, and where eaves and gutters can

be included within the HIRB. It is more likely that the 8m+60° would apply to a 6 storey building and that requires a 15.05m wide side.⁵

- 6.26 Considering this form three-dimensionally, the 4m+60° or 8m+60° HIRB promotes a building that exists down the length of the site, potentially with balconies to the sides where they could fit in the steps of the vertical walls and the HIRB envelope, or to the rear of the site.⁶
- 6.27 Whilst these examples provide for 6 storey buildings on a small site, it is anticipated that a number of sites would be amalgamated to enable a reasonably sized apartment building where the HIRB standards would not be so restricting. However, this will depend on individual developers' ability to acquire sites and aspirations. Alternatively, smaller developments might result on individual sites where the ability to achieve 6 storeys is more limited.
- 6.28 Kāinga Ora has sought a more enabling height in relation to boundary standard of 19m+60° along all boundaries within 21.5m from the frontage and 8m+60° along all other boundaries. This applies to developments with up to 3 units (where the 11m height control would apply for permitted activities) and for more than 3 units via a consent up to 21m (or as per any height overlay).
- 6.29 The 19m+60° easily enables 6 storeys on the same width site as the example set out above but fronting the street.⁷
- 6.30 In my opinion, this is a good form for 6 storey buildings as it allows the building to orientate to the street at all levels, resulting in a well-defined street edge which would assist with streetscape enclosure and create an urban streetscape. These provisions would also enable good three level buildings and assist in achieving higher density on smaller sites, which could be achieved by a larger range of people.
- 6.31 The building can also orientate to the rear yard where good outlook over its own site is enabled with no need for side windows or side outlook orientation minimising potential privacy issues, and could easily enable frosted windows and detailing of the side façade which

⁵ Refer Attachment B, SK09, example 3.

⁶ Refer Attachment B, SK09.

⁷ Refer Attachment B, SK10, Figure 1.

should be considered as part of the overall design. The outlook to the rear boundary in this example would be 14m, and if this form and site were repeated as a flip to the rear, a generous 28m separation between buildings would be achieved. This would provide excellent privacy separation, daylight and sunlight.

- 6.32 I consider that the 19m+60° HIRB together with the 50% building coverage standard is a useful mechanism in achieving a good quality urban form (not suburban) which encourages buildings to the street frontage and better enables 6 storeys on a greater number of sites.
- 6.33 I note that the HRZ-S5 (building coverage) in the Section 42A Report includes a 50% maximum, but does not apply to multi-unit housing or retirement villages instead relies on assessment of streetscape and visual amenity effects and dominance, privacy and shading to adjoining sites.
- 6.34 I recommend that the alternative HIRB needs to work with the 50% building coverage standard to manage total building bulk relative to neighbours and to encourage development to the front site where greater bulk can be achieved. The total building envelope would be more enabling, however the design process would need to determine the best location for bulk and design of the resulting building. Buildings along the full length of the side boundary could still result similar to the Council's option and with more opportunity at the front of the site.
- 6.35 Additional building coverage could be achieved through a consent process where the impact of additional bulk can be assessed. Specific guidance could be included in the guidelines relating to this.
- 6.36 When these options are considered in a street, the images in Attachment B, SK02 to SK04 illustrate the different outcomes between the Council's MRZ (11m and 4m+60° HIRB), the Council's option HRZ (21m and 8m+60° HIRB), then the Kāinga Ora option (HRZ - 22m, 19m+60°HIRB) respectively for development on each site individually. If say three sites abutting one another where amalgamated the two 'gaps' between the sloping 'roof' form in Attachment B, SK03 would not be restricted resulting in additional bulk to the street, closer to the bulk

illustrated in SK04. While I acknowledge that the images have been modelled using six sites in Porirua, I do consider they appropriately illustrate the contribution to the streetscape these different forms provide, and SK04 supports an urban streetscape with a well defined and enclosed street. The size of these sites is representative of sites in Kilbirnie for example however they have less topography.

- 6.37 In terms of the shading impact from these building form options, as one would expect, the Kāinga Ora alternative restricts sun access to a greater extent than the reporting officer's recommended planning framework. However, the two options provide good sunlight access to both the front of these sites and the rear yards, but at different times of the day, particularly with a limitation on building coverage. I do not consider the restricted sun access resulting from the Kāinga Ora submission to be inappropriate. However, this should be a matter for consideration through the consent process.
- 6.38 This alternative HIRB standard and the 50% building coverage will not prevent buildings occurring towards the rear of the site the same as the Council's option. However, this could result in lower building height to the rear and less bulk at the front due to a reduced footprint, unless it is a perimeter type building with open space in the centre of the site.
- 6.39 In my opinion, using the 19m+60° HIRB with a 50% building coverage results in a superior built form outcome as it would:
- (a) Ensure 3 to 6 storey developments can occur to a greater extent than the reporting officer's recommendation (i.e. a greater number of, and on smaller width sites);
 - (b) Encourage a built form to orientate to the street which is a desirable outcome in the HRZ;
 - (c) Assist in providing the opportunity for apartments to be designed so they can overlook the street or rear yard (rather than to side boundaries);

- (d) Provide for inactive side relationships between buildings without the requirement to step down to an existing lower dwelling;
- (e) Provide good sun access; and
- (f) Provide a balance of open space which can add to the amenity of the development including good outlook and privacy where trees could thrive.

6.40 The main difference between the reporting officer's recommendation and the Kāinga Ora alternative as experienced from a neighbouring property, is that the Kāinga Ora alternative will enable a greater built form closer to their common boundary, particularly at the front part of the site. However, the NPS-UD expects that the existing amenity values will change,⁸ and I consider that experiencing a larger building adjacent to an existing dwelling in the HRZ is consistent with the high density planned outcome.

Heights in MRZ

- 6.41 The Section 42A recommends an 11m (plus 1m roof) height standard for up to three dwellings, and enables 14m for retirement villages and multi-unit housing within Height Area 2 which apply to areas in Kelburn and around Local Centres such as Hataitai and Brooklyn.
- 6.42 Kāinga Ora sought an 18m standard (5 storeys) around Local Centres (6 storeys). 14m would enable 4 storeys with 5 storeys at 18m.
- 6.43 The additional opportunity is limited by the 4m+60° HIRB and therefore will be reliant on wider sites. I consider a varied outcome will result and the difference between 4 and 5 storeys is not so significant that would cause additional effects when used with the 4m+60° HIRB. 18m provides additional flexibility for topography also.

HIRB in MRZ

- 6.44 Kāinga Ora sought an increase to the height of the starting point for the recession plan in MRZ – S3 (HIRB) from 5m to 6m for Multi-unit and retirement villages. These require a consent and therefore design

⁸ Policy 6 of the NPS-UD.

matters at the interface can be managed through that process. Attachment B Sk08 illustrates these options. Comparing PDP - Example 1 with KO - Example 1, the relationship to a side (neighbours) boundary is very similar using the 3m floor to floor. These illustrate that four storeys can result on a slightly narrower site. I consider the increase to 6m would achieve acceptable outcomes very similar to the 5m option.

Boundary Setbacks in the MRZ

- 6.45 The reporting planner recommends that the front and side yard standards apply to developments up to three units in the MRZ, where they did not apply in the PDP.
- 6.46 I consider that a 1.5m front yard in a more suburban context such as the MRZ provides some front yard transition and boundary treatment opportunity, including planting which can result in good design outcomes.
- 6.47 It is perhaps more important that there is a setback for permitted buildings to mitigate the potential adverse effect of poor design outcomes that the Plan has no control over, such as a blank wall at ground level at the street boundary. A garage could be proposed in that location (subject to turning space), accessed off an internal shared driveway, or other less desirable activity.
- 6.48 This would probably require the upper levels of the dwelling to provide the required glazing in the front façade. Even worse, the glazing could be in the wall of the garage which is covered with storage stuff. The front yard does not prevent that outcome, but it provides the opportunity for a fence and planting (although not required in the front yard by the Landscape standard). The dwelling could still have a very poor relationship to the street, however that is what the MDRS enables.
- 6.49 I support the 1.5m front yard standard in the MRZ.
- 6.50 Turning to side yards, no side yard setback enables single level buildings to abut the site boundary (assuming 4m+60 HIRB), avoiding wasted strips of land along both sides of a site between a building and

the boundary. The potential impact is that a slightly greater mass could be experienced by a neighbour and might be perceived differently to an outcome where there is a setback as there would be no layering of a fence on the boundary then set back to a building wall. It does however, provide greater opportunities for buildings to front the street with a positive outcome, particularly on narrower sites where a garage might be included in the front façade leaving a narrow portion for a house. It avoids the cost of building a fence, but potentially has maintenance issues for consideration. From a design perspective I consider the benefits of maximising the street frontage outweighs any perceived added bulk.

Boundary setbacks in HRZ

- 6.51 My interpretation of the recommended HRZ-S4 by the reporting planner means that the Rail corridor boundary applies and the rear yard for up to 3 units applies. The front and side yards do not apply to any activity.
- 6.52 Dr Zamani in his statement states that he decided to bring back boundary setbacks “to align with the MDRS, except for the front yard, which in his opinion is not necessary because it is a high density residential environment and it is considered to be an efficient use of land”.⁹
- 6.53 Dr Zamani does not explain why the 1m side yard setbacks are required other than to align with the MDRS. However I consider they could fall into the same camp as being an efficient use of land if they were not included. It appears that the evidence of Dr Zamani differs to the text in the standard HRZ-S4 recommended by the reporting planner, where it does not require side yards or front yards. It is unclear what applies and why.
- 6.54 My comments relating to the front yard are the same as for the MRZ as this is a residential zone and should have a physical difference to a centre zone where the character is residential and a transition to ground floor residential is particularly important from a privacy perspective. However, this could be achieved without a minimum front

⁹ Statement of Evidence – Dr Zamani, Para 36.

yard setback through a design solution. It is not the only outcome and if commercial activities occurred at ground floor these would suit abutting the front boundary, and could be achieved through a consent where non-compliance with the standard occurs. I recommend the front yard standard is included and applies to all development on a site.

- 6.55 The requirement of side setbacks is not discussed by Dr Zamani but I understand he is saying they should apply. I do not have an issue with them applying, however buildings abutting the side boundary in a high density zone is not necessarily a poor outcome particularly as 1m provides very limited opportunity for any substantial planting or other outcome. The interface can be assessed through a consent process.

Maximum Building depth and minimum building separation for multi-unit housing

- 6.56 Kāinga Ora submissions sought that HRZ-S16 and HRZ-S17 be deleted as multi-unit development is required to obtain consent under rule HRZ-R14 as a restricted discretionary activity.
- 6.57 I assume the diagram limits building length along a side boundary to 20m maximum but with multiple buildings enabled with a 10m separation between.
- 6.58 I consider that these standards are unnecessary and further restrict the flexibility for the design response on a site. I have used similar standards before and buildings can be much closer on a site depending on the location of windows and open space etc. These standards appear to relate to both on site and off site amenity. I am also concerned that if these standards are not complied with, the assessment criteria include Dominance, Privacy and shading effects on adjoining sites, noting it does not require assessment as to the effects on the site.
- 6.59 Given the HIRB and Height standards typically set the parameters for bulk next to another site, I can't see how the dominance or shading of a neighbouring property would be any different, therefore a non-compliance would not cause additional adverse effects. If there is an issue with dominance, for example, this should be clearly articulated in

the guidance where the assessment of a proposal can consider this and ensure an appropriate response.

7. COMMERCIAL AT GROUND FLOOR

7.1 Kāinga Ora sought to change HRZ-R9 to enable ground floor commercial activities at the base of apartment buildings, limited to not more than 200m² GFA with operational time restrictions.

7.2 I support this change as:

- (a) The design and use of the ground floor of apartment buildings is the most important aspect of such a development where they interact with the street or open space.
- (b) Commercial activity at the ground floor is a good way to avoid potential privacy and amenity issues associated with residential at ground floor.
- (c) These activities can provide meeting locations for residents and others in the neighbourhood, and can assist with live-work opportunities and the supply of daily needs.
- (d) The commercial activity can add to the activity at the street level, provide interest along the street which supports walkability.

7.3 Commercial activity should be enabled and encouraged, and the proposed changes specifically provide for this at ground level of an apartment building with a maximum permitted gross floor area. The proposed wording acknowledges that any commercial activity will be ancillary to residential activity and at a location where it is best suited to avoid effects on the residential environment and has the potential to provide positive effects on the street amenity and for residential users of the site.

8. CHARACTER AREAS

8.1 I wish to comment briefly on this issue as it impacts the zoning applications in the maps in Attachment C. The decisions on character

areas could further influence the zoning patterns and should be another matter for any further refinement of the zone application.

- 8.2 I rely on the evidence of Ms Woodbridge who discusses the planning issues of the proposed character precincts and whether they are qualifying matters.
- 8.3 I consider that in accordance with Policy 3(c) of the NPS-UD, the zoning should be applied using that clear directive. This would mean that some of the Character Precinct areas would be zoned HRZ, rather than MRZ. I support this from a density perspective, particularly due to the close proximity to the City Centre and (proposed) Town Centres. I consider the issue is not so much an issue of density, rather built form.
- 8.4 Six storeys (or other heights) is likely more appropriate as a back drop of the character areas as seen from the street which is signalled by the HRZ zoning around these areas included in the Section 42A. This is because there are locations where existing taller buildings are seen behind a character area from the street, (such as seen from Majoribanks Street of the environment between Hawker Street and Earls Terrace where a 5 storey (at least) building exists at 1 Earls Terrace, or the 5 storey existing building, or Claremont Grove is adjacent to the Character area to the west). The combination of these existing building forms contribute to the existing character of the area, regardless of whether they are in a character precinct.
- 8.5 Should the character be required to be managed then the precinct or overlay should control the outcome including providing clarity of the outcome sought, with development standards and matters of assessment to support that.
- 8.6 The consideration of the built form around a character precinct is also important in terms of say the streetscape character for example, and any changes to the surrounding will also impact the character areas. I understand that the application of the different zones at these areas are considered suitable by the reporting planner to manage the outcomes on surrounding land. However, that is on the assumption the Council HRZ option is confirmed. The decision on the planned

urban built form of the HRZ may need to be made prior to determining the best method for managing these areas.

- 8.7 I am concerned that the interface controls as applied using the Council's zoning pattern could restrict development in the HRZ in surrounding areas which may or may not be appropriate. For example, the existing 13 storey building at 125 Grant Road, Thorndon is outside of a character precinct. However, the precinct applies to land to the east of its rear boundary. The rear façade of that building is approximately 7-10m from the rear boundary. The whole area is zoned MRZ as recommended by the reporting planner. Those standards would not enable this existing building to be built, and I consider that given the scale of it, any application for a new building of a similar size would not be granted consent. However, some additional taller buildings in this area would not be out of character in the wider landscape given the existing context.
- 8.8 If this area was zoned HRZ, which I consider is an appropriate action, the Council HRZ-S3 HIRB (5m+60°) would control height on the land adjacent to the precinct. This would also not enable a similar new tall building to comply, but it might enable 6 storeys. Consent for additional height could be sought and the HRZ-S3 includes assessment criteria including dominance, privacy and shading effects, and effects on the identified character or heritage values of a neighbouring character area. When one considers the design guide (which sets out the values for Thorndon) there is no mention of the existence of some tall buildings in the context description which are part of the character of that place.
- 8.9 The main character value I interpreted from the guide is that the large character precinct signals the importance of this area due to the intactness of the character in the building stock. Another aspect is the importance of the Te Ahumairangi Hill as a back drop to the suburb (and city). This suggest to me that a wall of tall buildings along Grant Road that would block the views to the back drop would be in appropriate, however a few more taller buildings would not cause adverse effects on this character value. The other values relate to the streetscape.

8.10 I my opinion the HRZ is better at this location as there is a planning framework proposed to enable taller buildings to be considered in a location very close to the city centre where there is some opportunity for higher density. Provisions may or may not need to be added to a precinct depending on the zoning pattern and the outcomes sought.

9. DESIGN GUIDELINES

9.1 My general criticism of the guidelines is that they lack images of important aspects such as the character values, or good examples to help guide design decisions, particularly above three storeys. Guidance around how to design buildings that might be over height should be included.

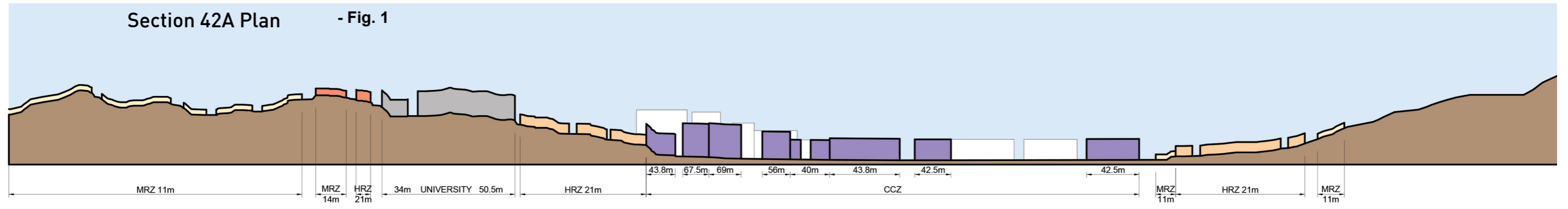
9.2 In regard to the character precinct in the residential design guideline, I consider that a clear statement should be included listing the “identified character or heritage values” would be very helpful so that the assessment criteria such as in HRZ-S3 proposed by the reporting planner has something tangible to link to if this method is to be retained. The guideline uses the term ‘attributes’, however these attributes collectively will contribute to the character values and the values need to be distilled from these.

9.3 The guidelines may need to change depending on the decision on the planned outcome for the HRZ for example, and I would be happy to assist in that process.

Nicholas J Rae

17 March 2023

S42A recommendation



Notes:

Any precinct height controls have not been represented.

Disclaimer:

Topography based on 1m contours (LINZ). Heights applied to the blocks. HIRB was not considered. The likely outcome would include a variety of building heights.
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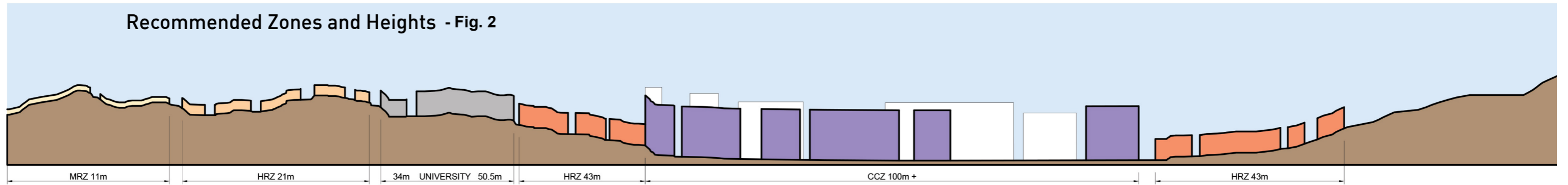
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WELLINGTON CITY CENTRE HEIGHT ANALYSIS

Sections
Kainga Ora

Scale @ A3 1:6000 Date : 17 March 2023

SK01
Rev 0



Notes:

Section representing the recommended zones and heights in Attachment C.
 For the CCZ, a height of 100m has been selected to represent the Kainga Ora submission however that sought no height limit. This is indicative and subject to the centres hearing stream.
 Any precinct height controls have not been represented.

Disclaimer:

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WELLINGTON CITY CENTRE HEIGHT ANALYSIS

Sections
 Kainga Ora

SK02
 Rev 0

Scale @ A3 1:6000 Date : 17 March 2023



Note:
 The sites modelled are in Porirua; however, they are appropriate to illustrate the difference in building envelope options. Sites of a similar size (15m) in Wellington are located around 62 Freyberg Street, Kilbirnie.

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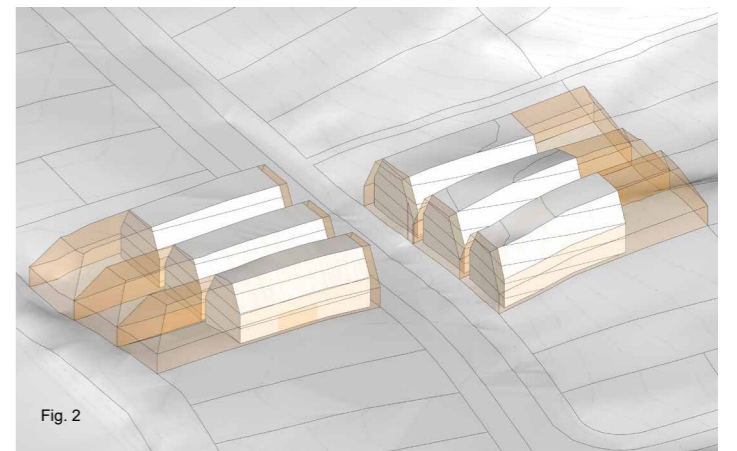
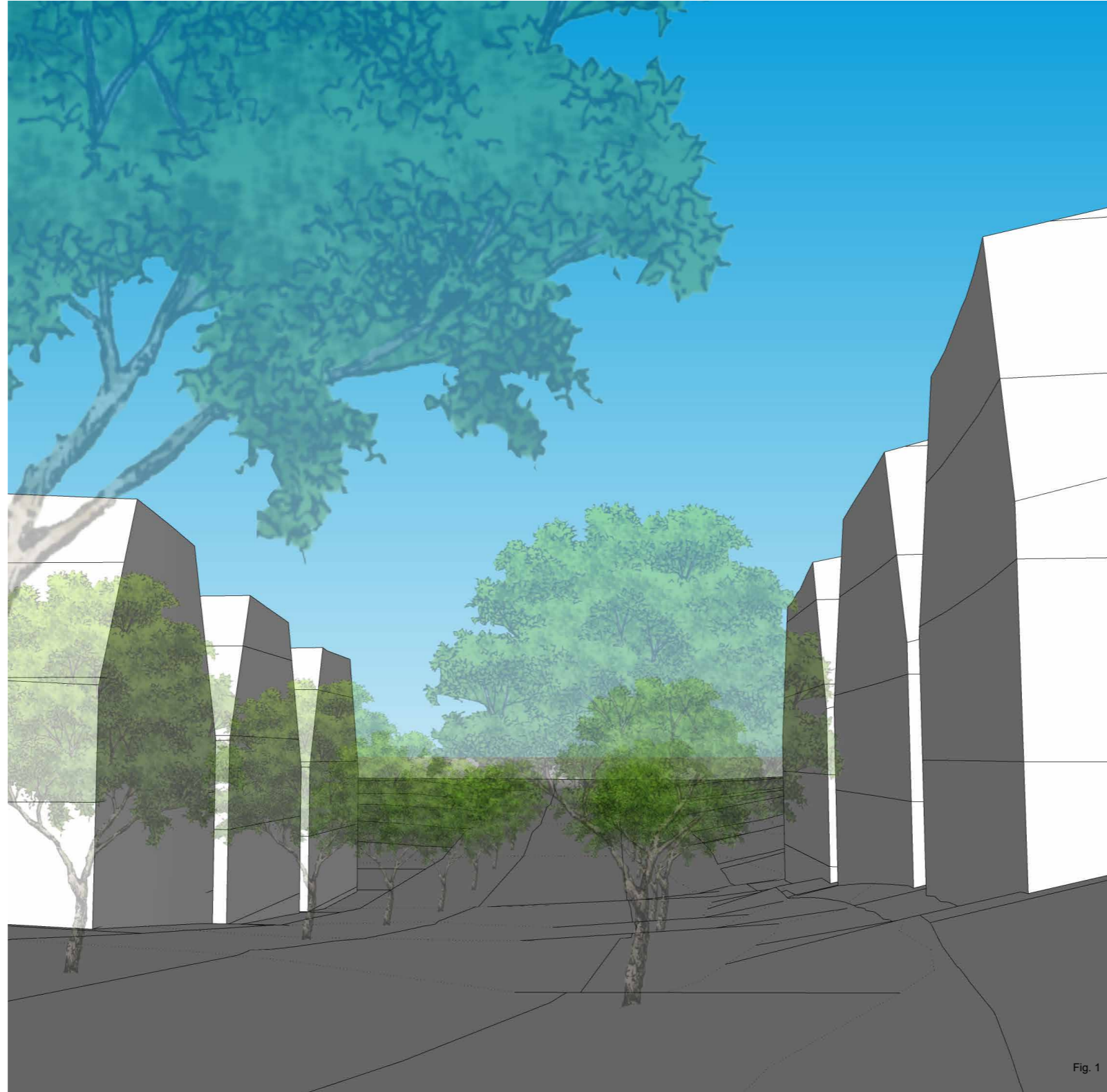
HIRB CASE STUDY

Kainga Ora

Date : 17 March 2023

SK01
 Rev 0

MRZ			
Height	Building Coverage	Yards	HIRB
11m	50%	1.5m (front), 1m (side and rear)	4m+60°



Note:
The 14m height standard and 5m+60degrees HIRB provided for in MRZ has not been illustrated; however, would result in additional bulk.

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MRZ - POTENTIAL STREETSCAPE

HIRB CASE STUDY

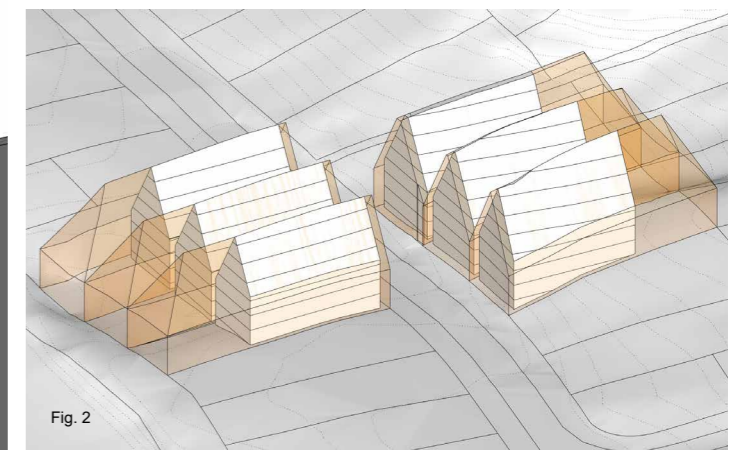
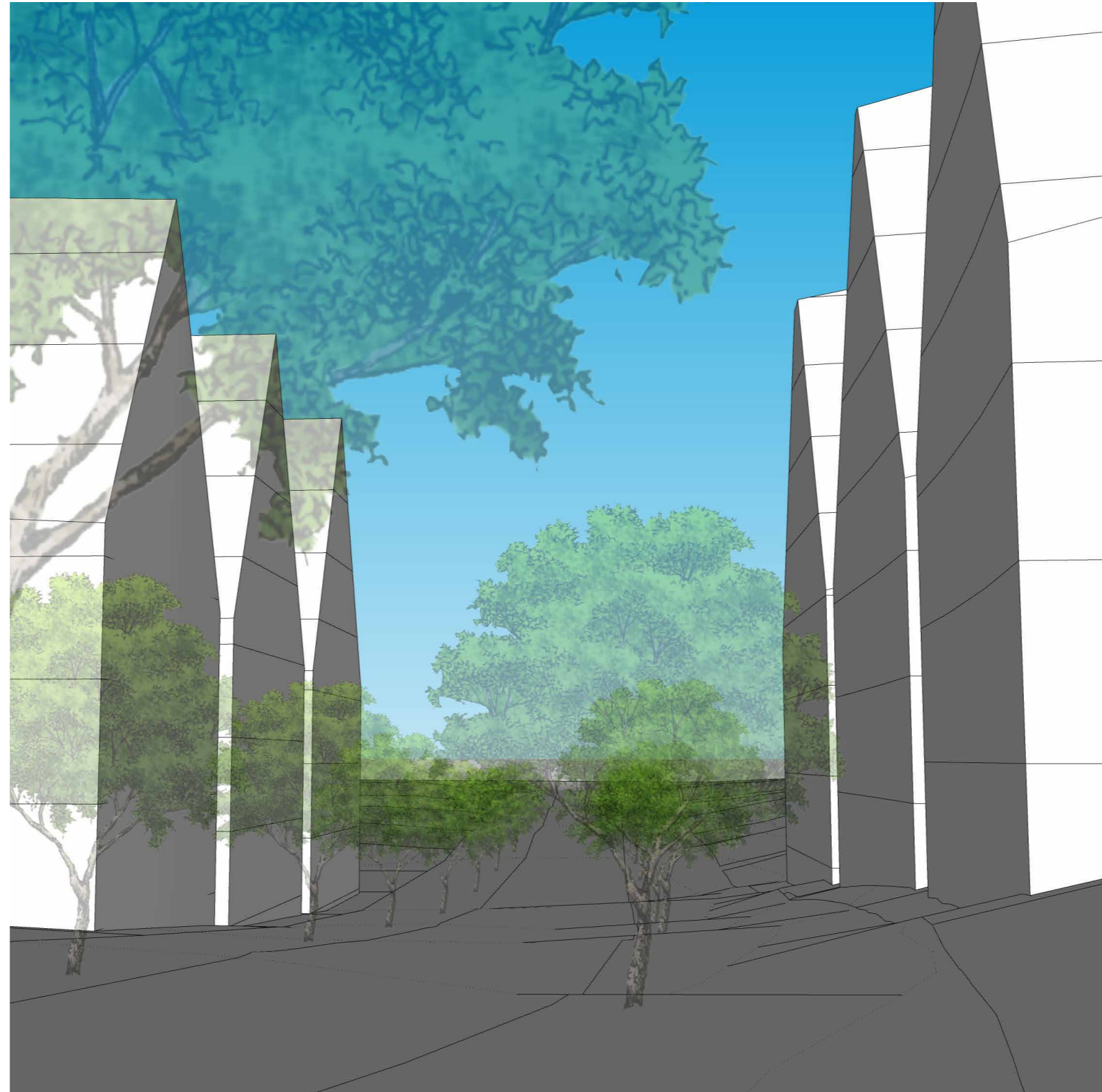
Kainga Ora

Date : 17 March 2023

SK02
Rev 0

HRZ - PDP

Height	Building Coverage	Yards	HIRB
21m	50%	1.5m (front), 1m (side and rear)	8m+60°



Note:
 Illustrating the more permissive standars for multi-unit and retirement villages.

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PDP HRZ - POTENTIAL STREETSCAPE

HIRB CASE STUDY

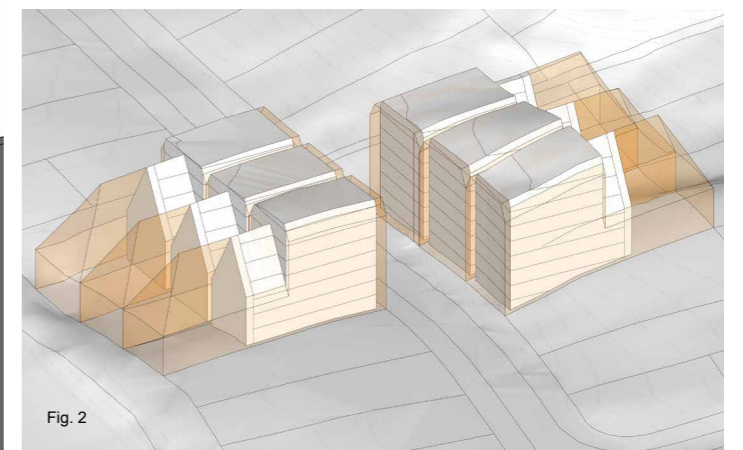
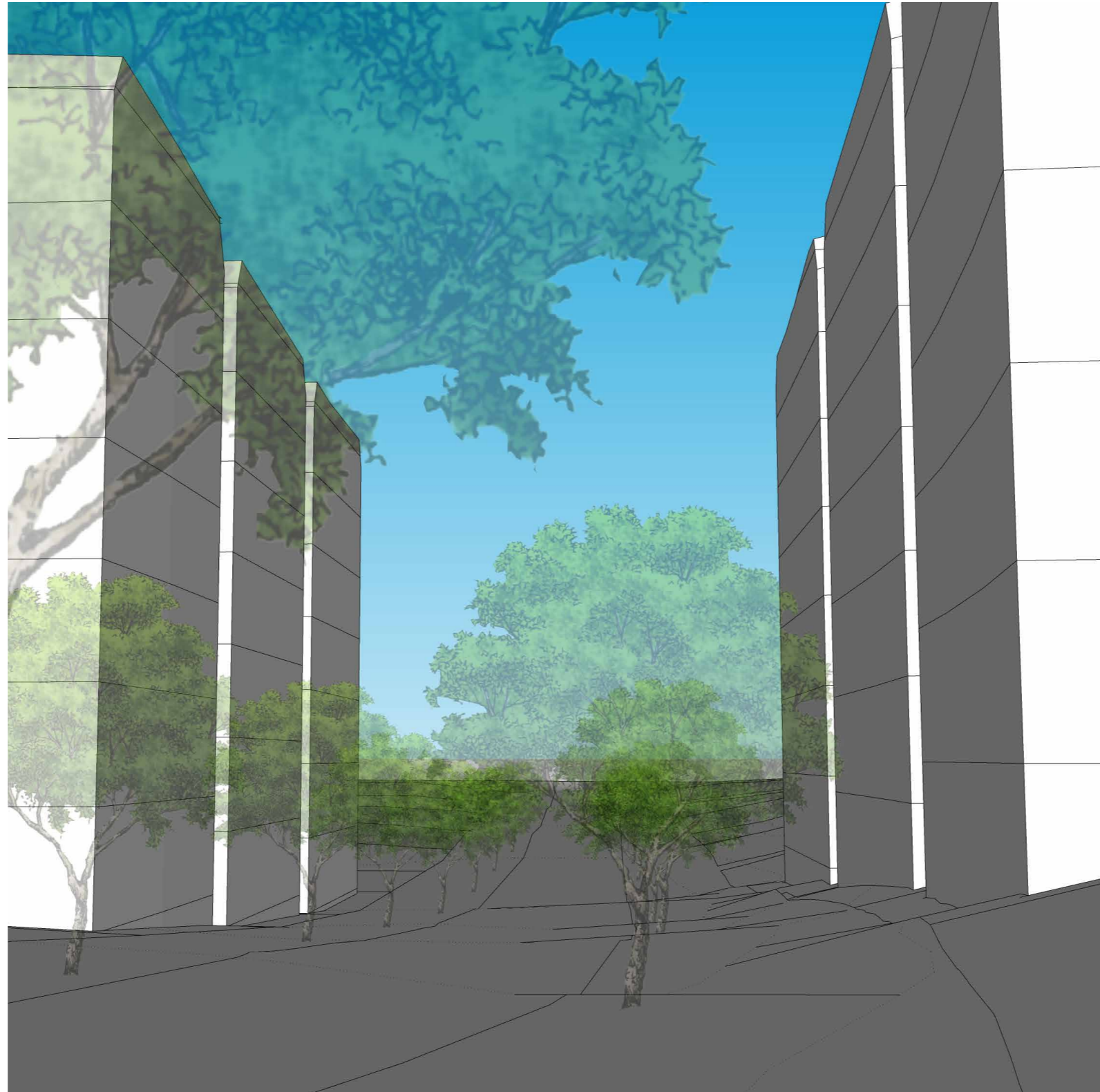
Kainga Ora

Date : 17 March 2023

SK03
 Rev 0

HRZ - KO

Height	Building Coverage	Yards	HIRB
22m	50%	1.5m (front), 1m (side and rear)	19m+60°(22m) 8m+60°



Note:
 Kainga Ora accept S42a height of 21m. Model has not been adjusted to reflect this.

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HRZ KAINGA ORA - POTENTIAL STREETSCAPE

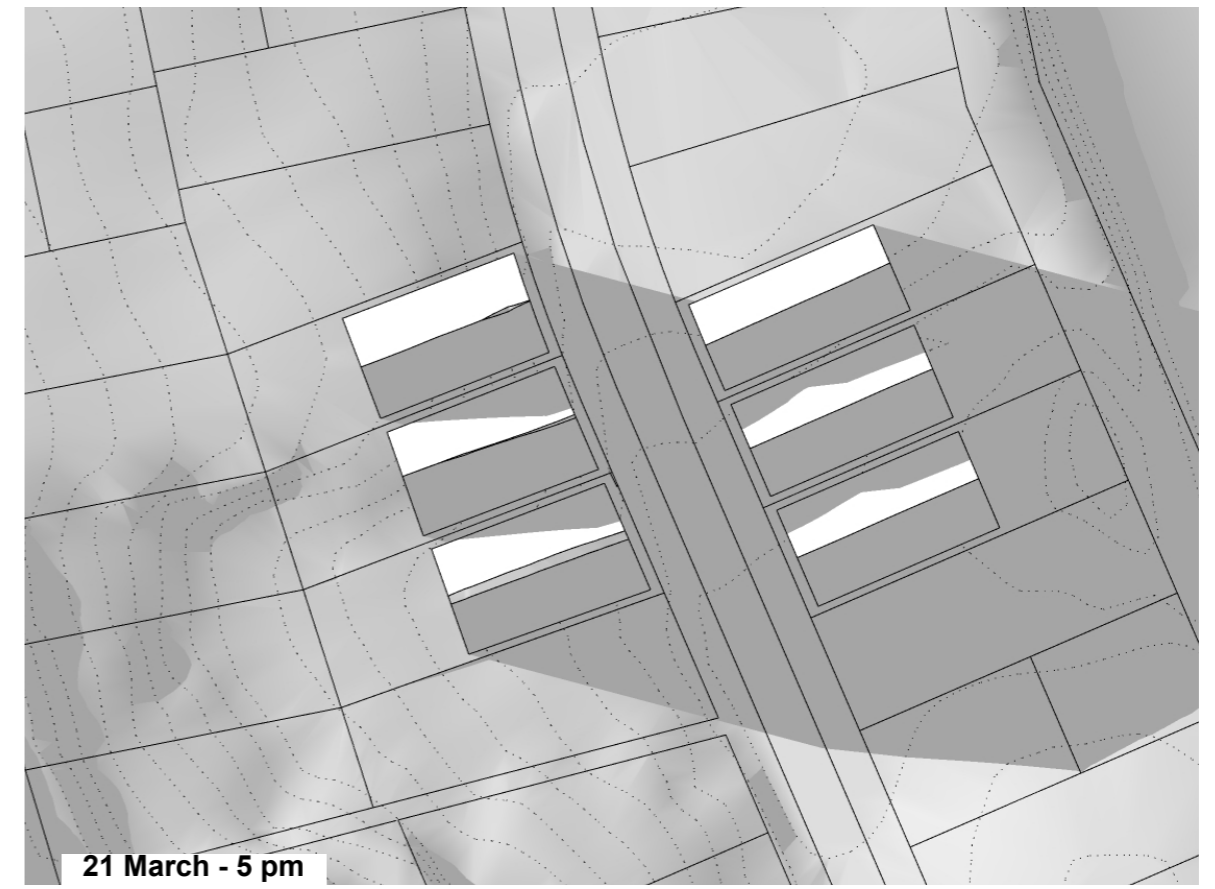
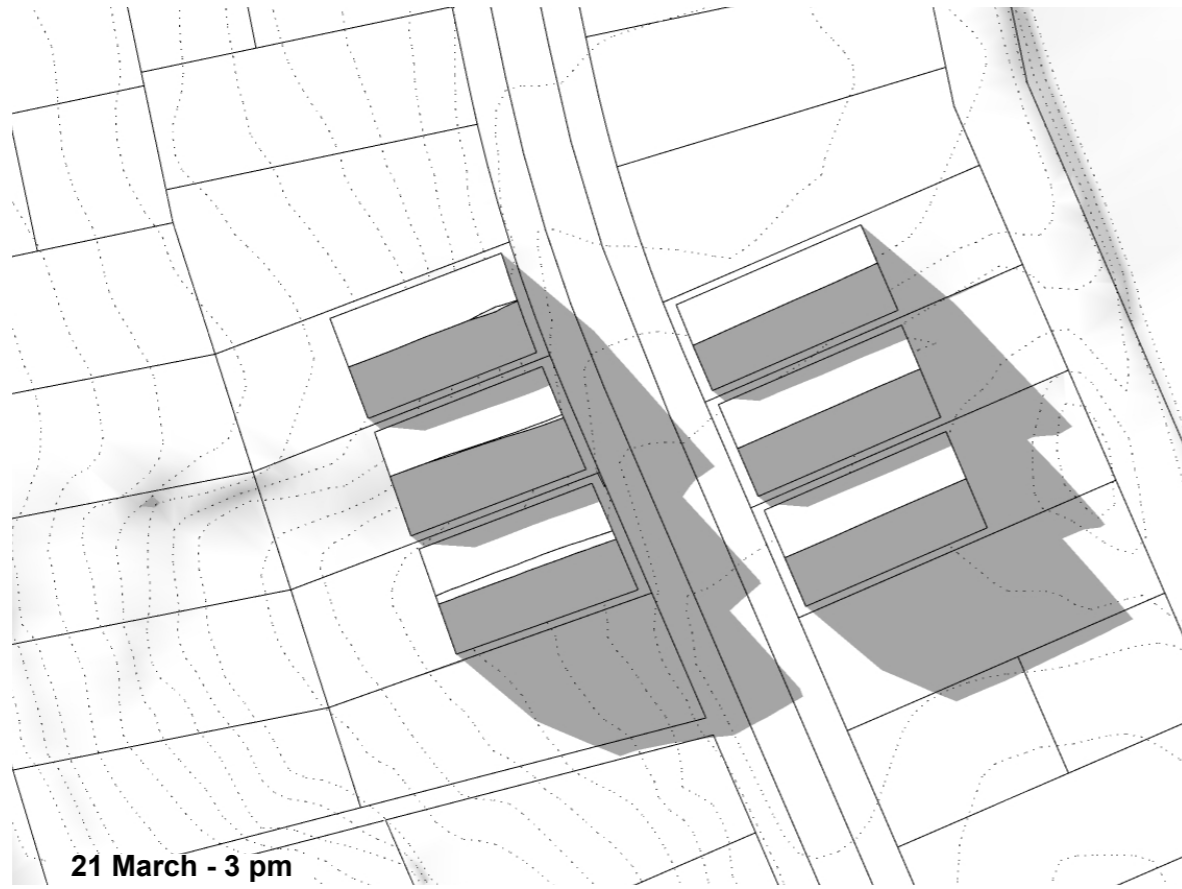
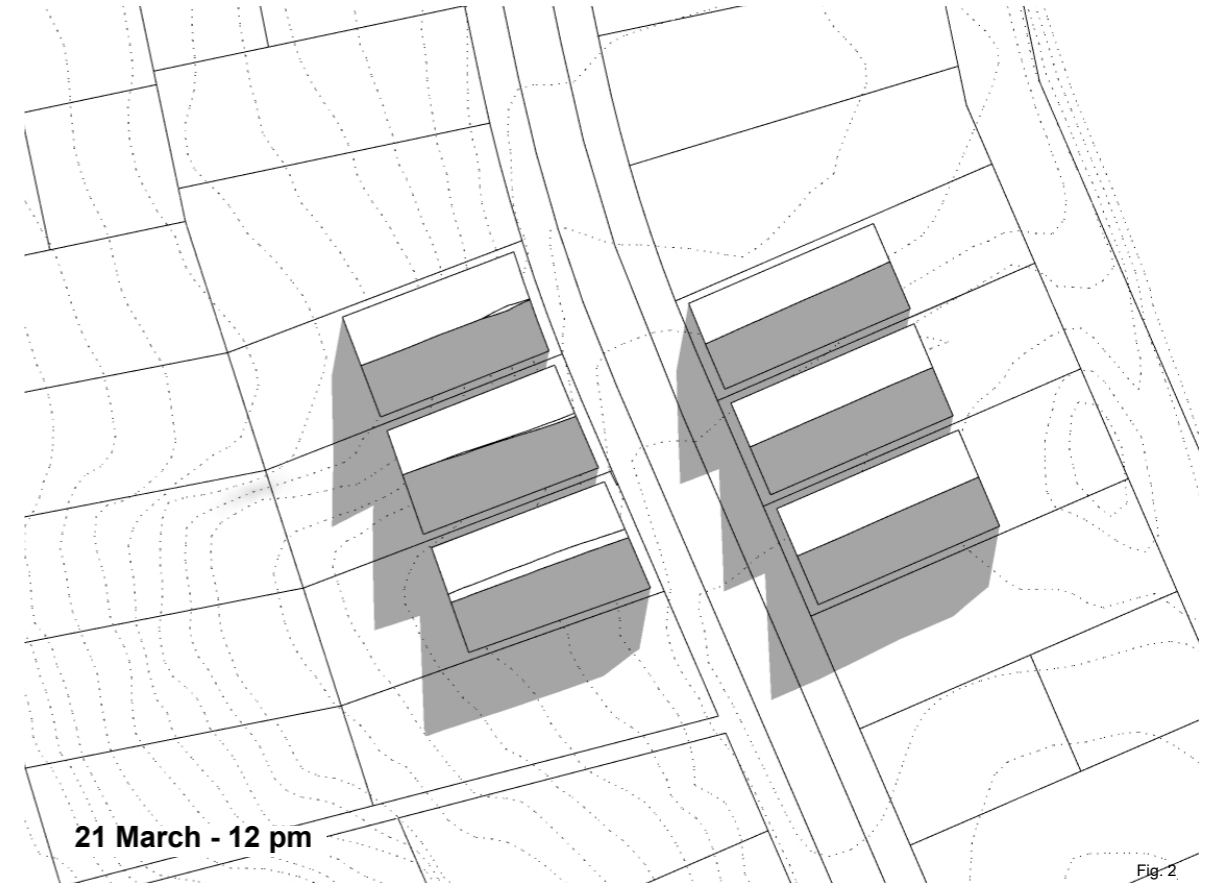
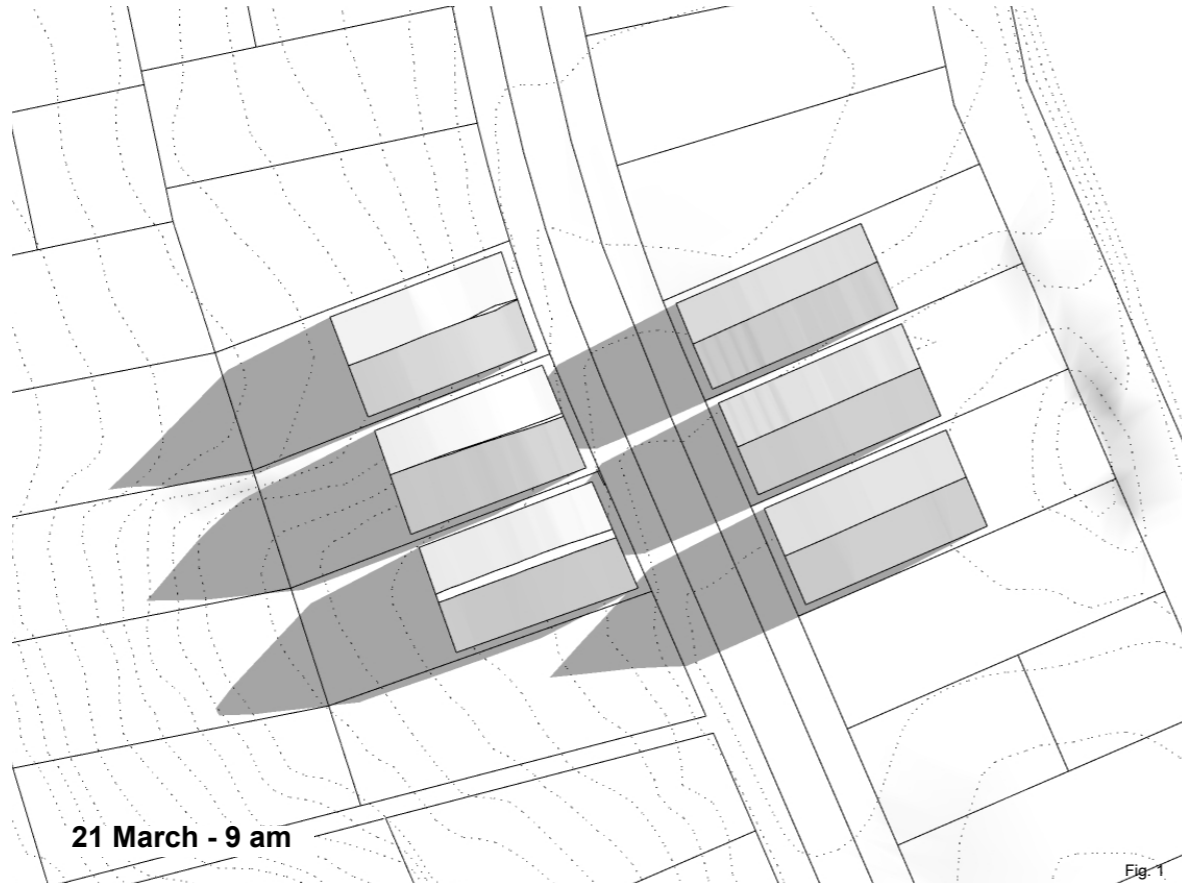
HIRB CASE STUDY

Kainga Ora

Date : 17 March 2023

SK04
 Rev 0

HRZ - PDP
Height
21m
Building Coverage
50%
Yards
1.5m (front), 1m (side and rear)
HIRB
8m+60°



Note:
This illustrates one option for building size and location on a site with 50% coverage, maximising bulk to the street. Many other outcomes are possible.

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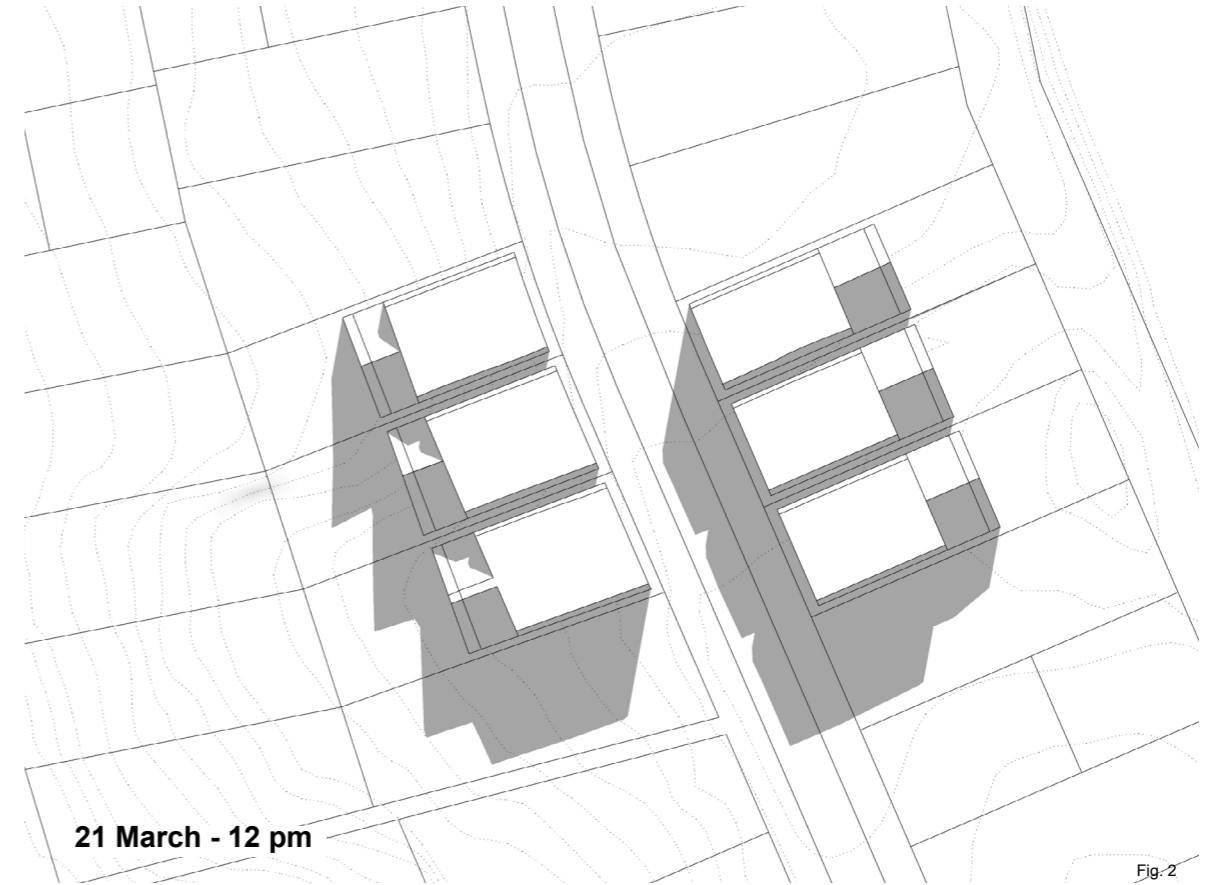
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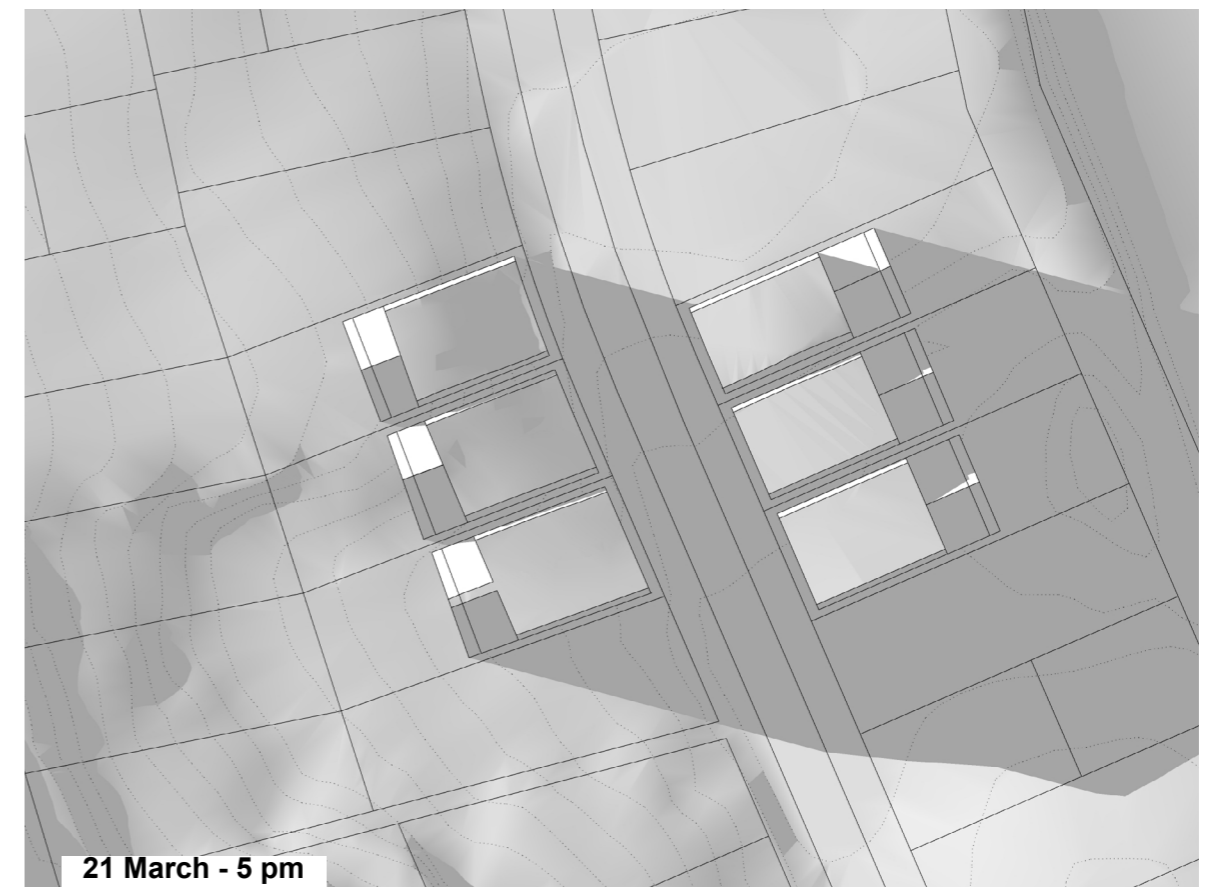
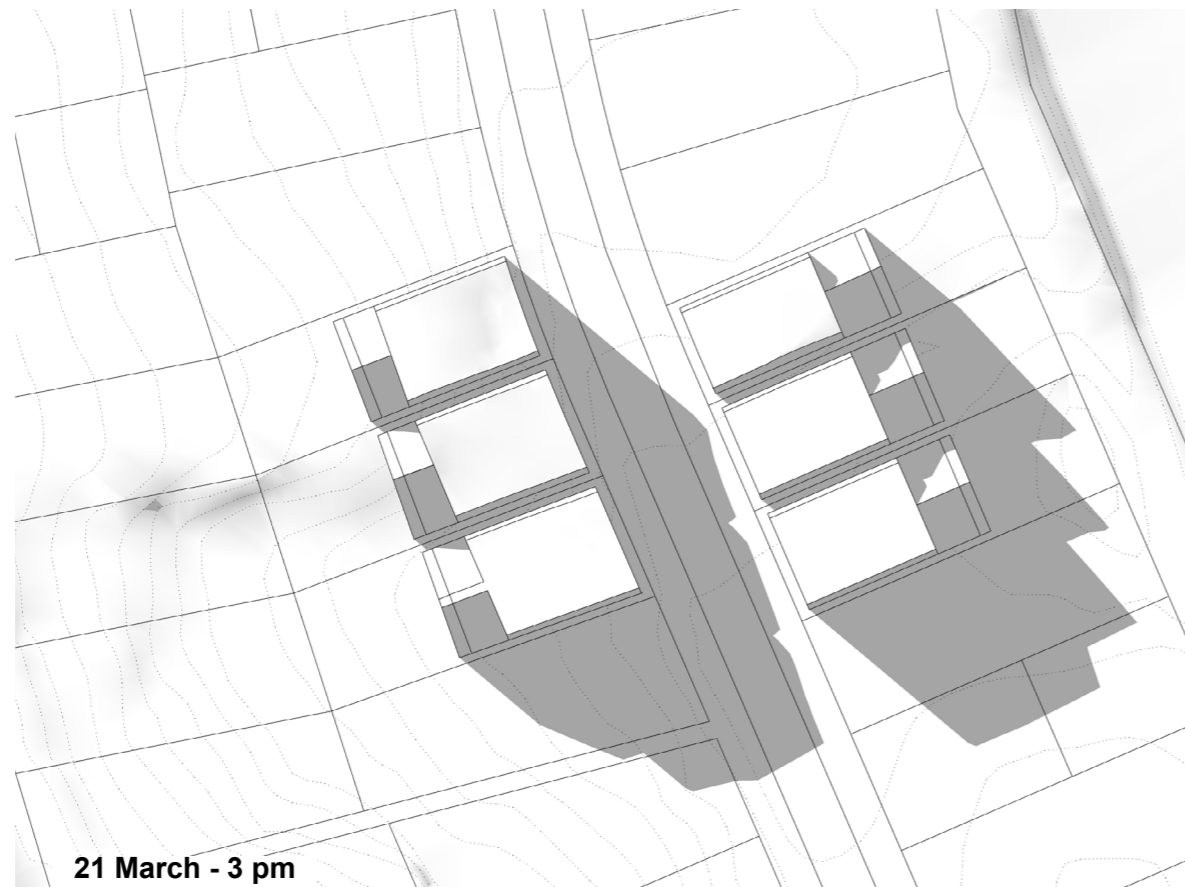
North

SHADING - PDP HRZ
HIRB CASE STUDY
Kainga Ora
Date : 17 March 2023

SK05
Rev 0



HRZ - KO
Height
22m
Building Coverage
50%
Yards
0m (front), 1m (side and rear)
HIRB
19m+60° (22m) - 8+60°



Note:
This illustrates one option for building size and location on a site with 50% coverage, maximising bulk to the street. Many other outcomes are possible.

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SHADING - HRZ KAINGA ORA ALTERNATIVE HIRB

HIRB CASE STUDY

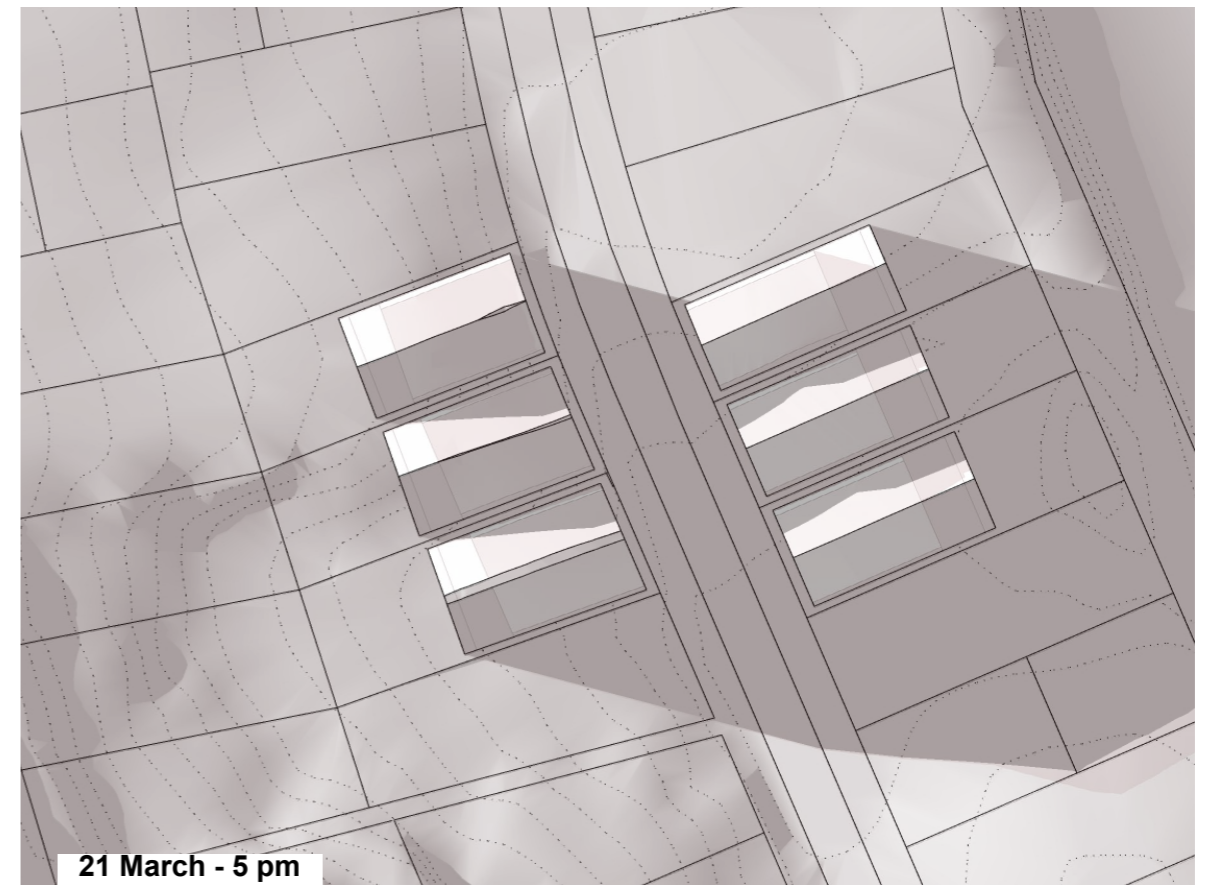
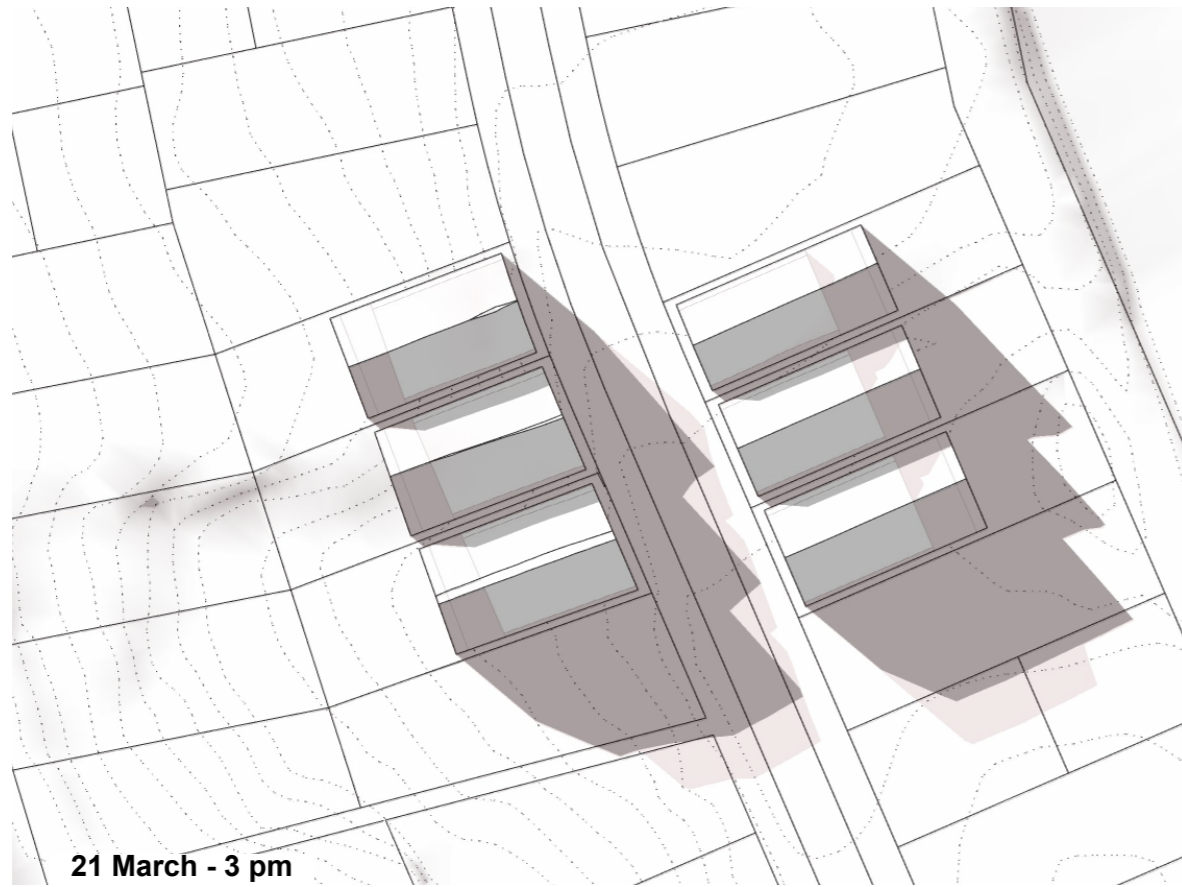
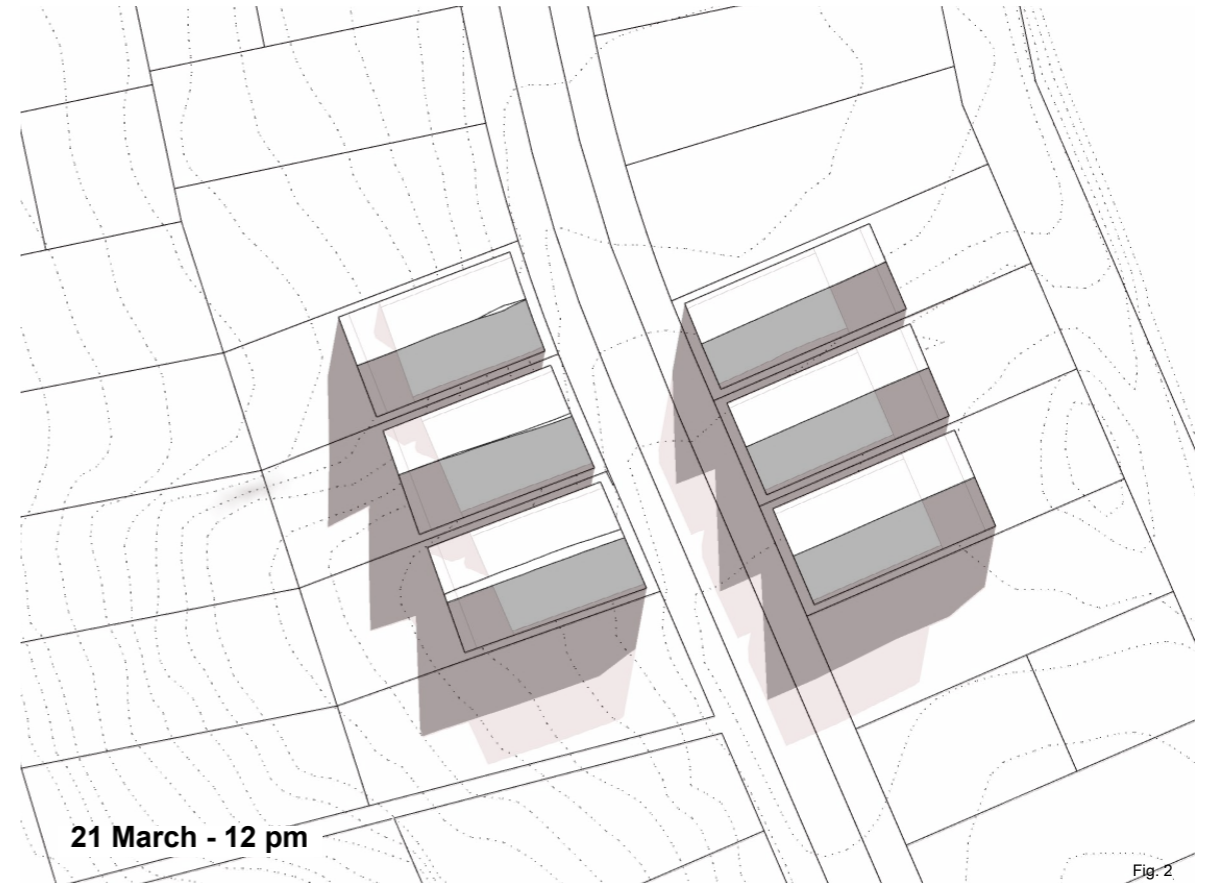
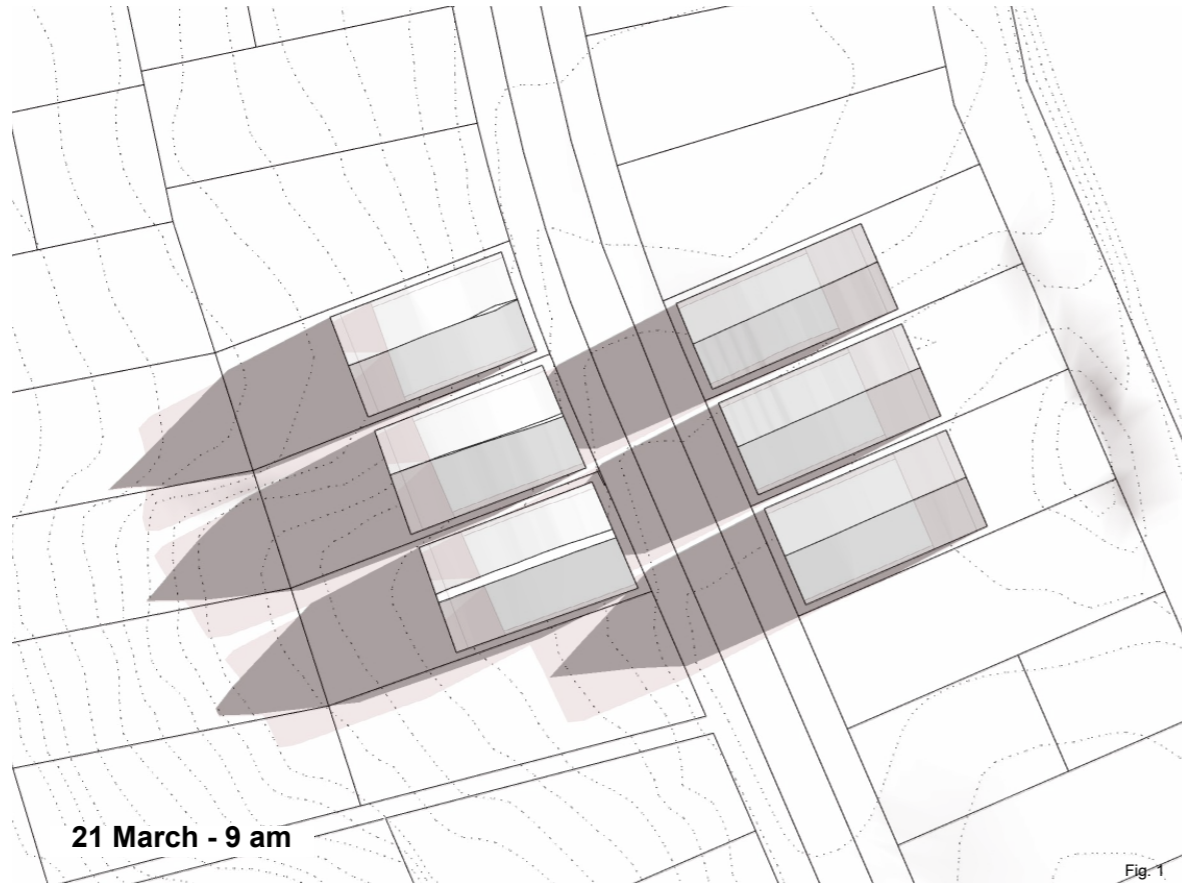
Kainga Ora

Date : 17 March 2023

SK06
Rev 0

HRZ - PDP
Height
21m
Building Coverage
50%
Yards
1.5m (front), 1m (side and rear)
HIRB
8m+60°

HRZ - KO
Height
22m
Building Coverage
50%
Yards
1.5m (front), 1m (side and rear)
HIRB
19m+60° (22m) - 8+60°



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SHADING - PDP HRZ VS KAINGA ORA

HIRB CASE STUDY

Kainga Ora

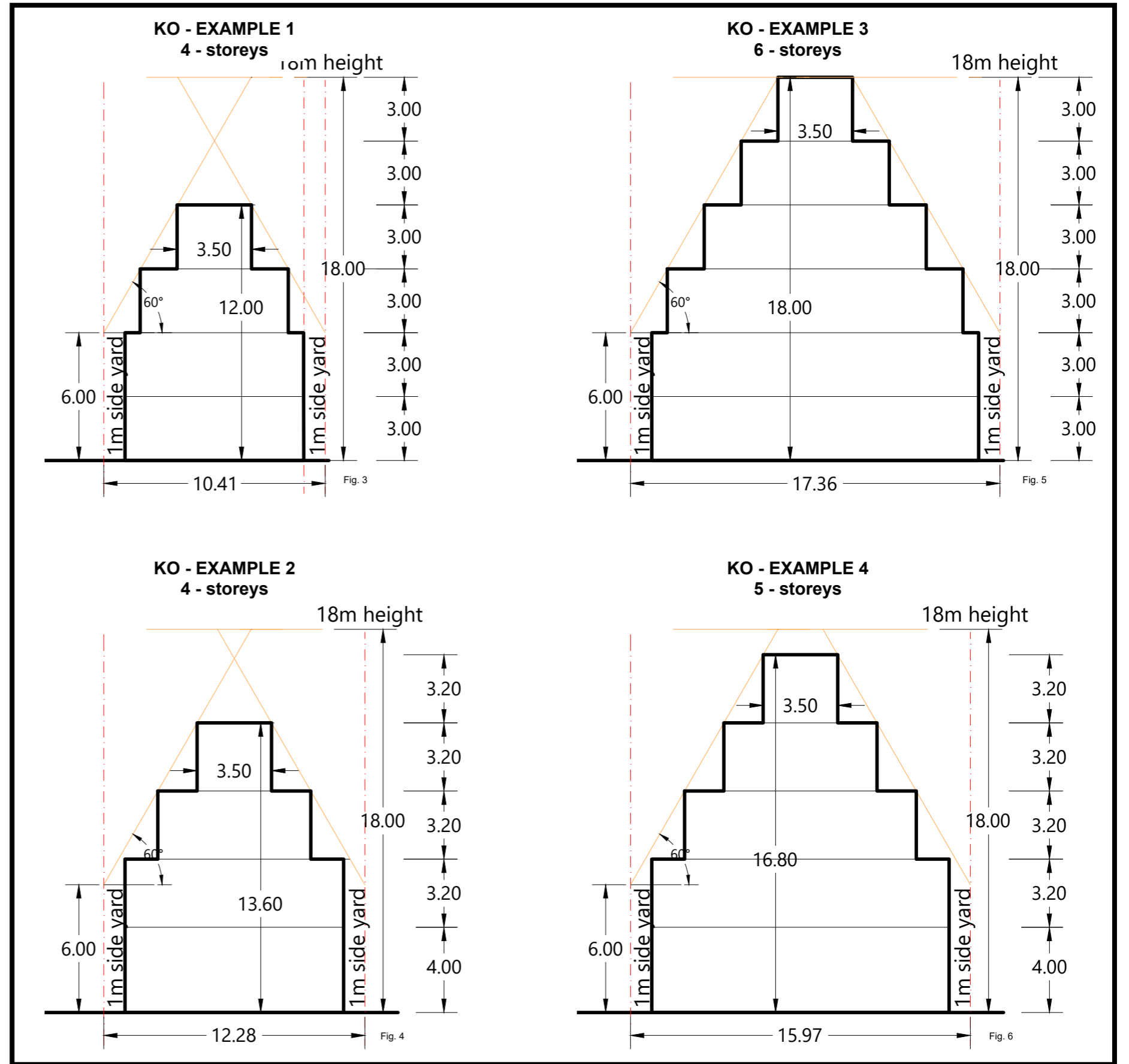
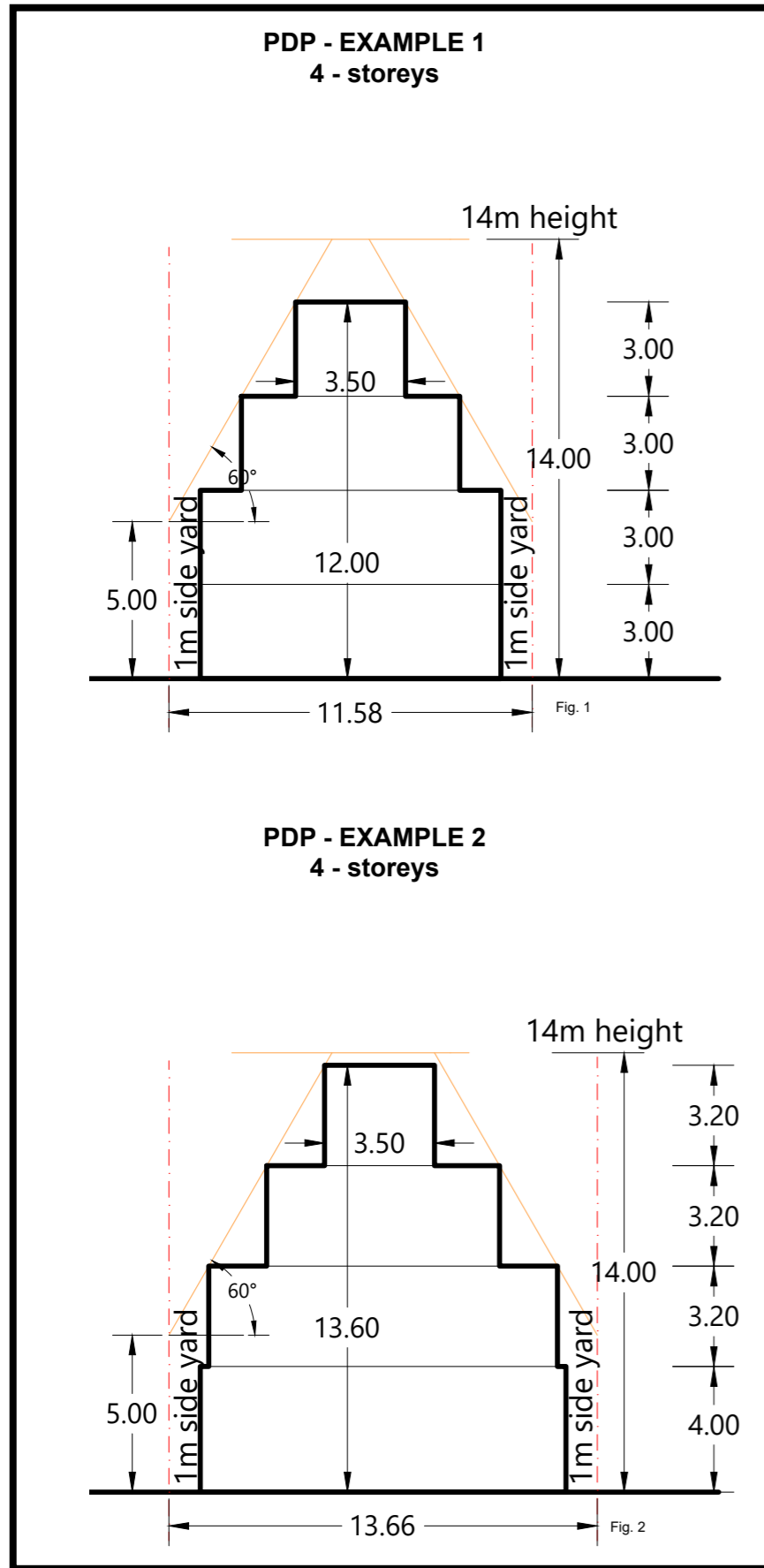
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North

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SK07
Rev 0



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HEIGHT VS SITE WIDTH - MRZ HEIGHT OVERLAY
PDP VS KAINGA ORA - MINIMUM SITE FRONTAGE INVESTIGATION

Kainga Ora
Date : 17 March 2023

SK08
Rev 0

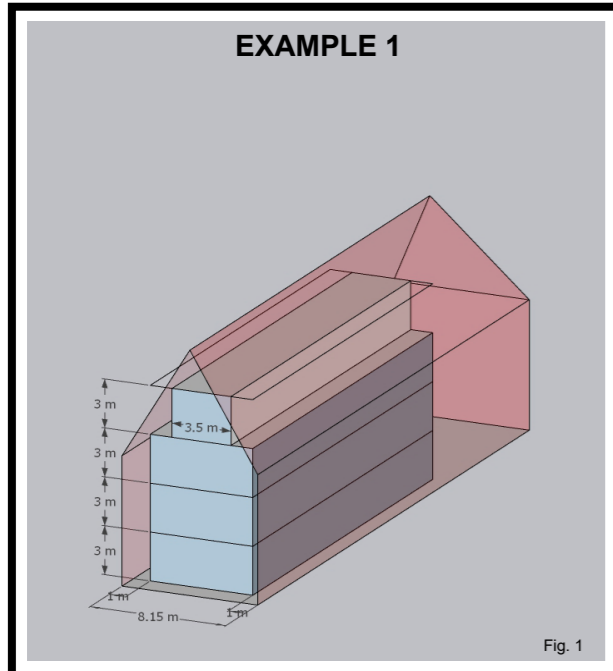


Fig. 1

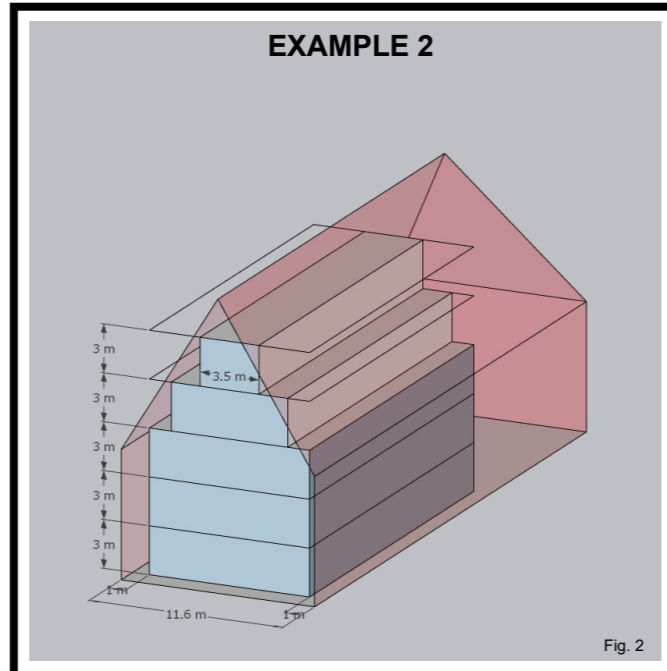


Fig. 2

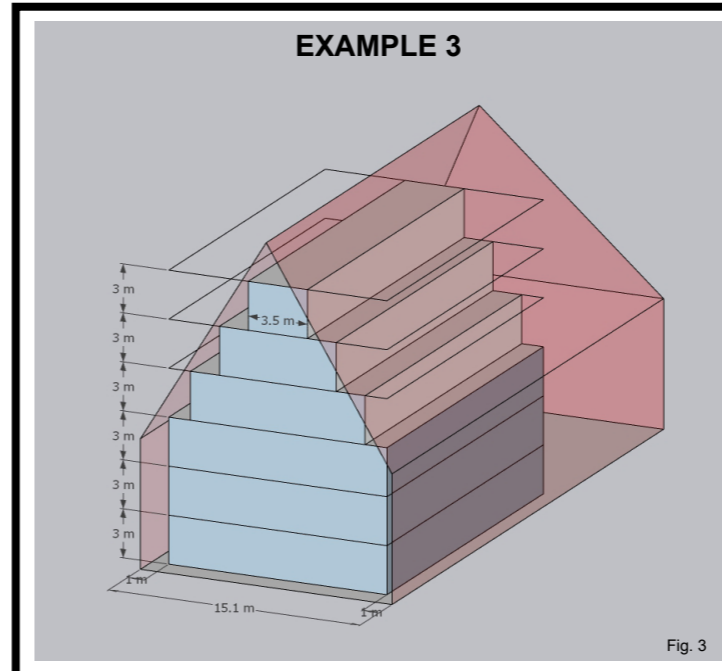


Fig. 3

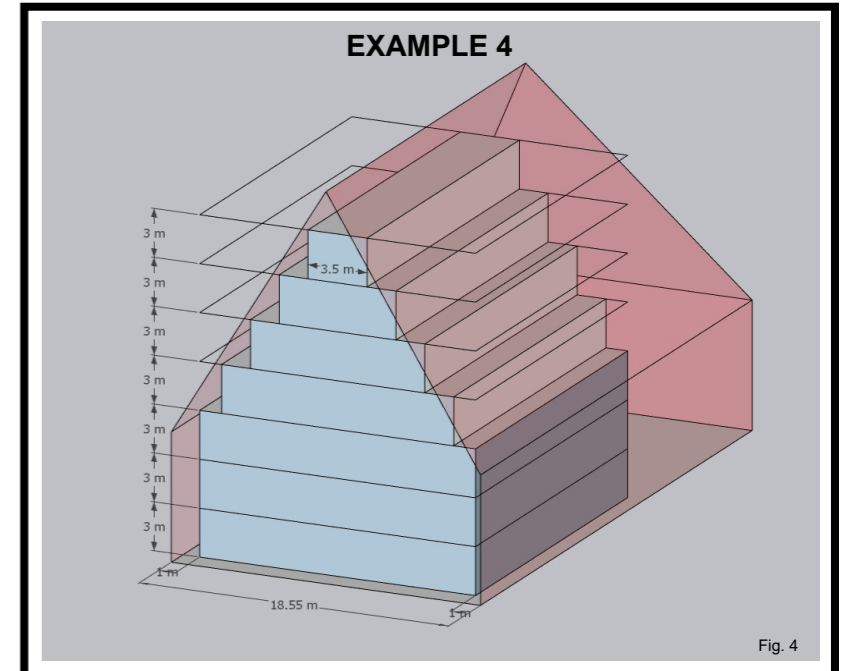


Fig. 4

HRZ - PDP

Height

21m

Building Coverage

50%

Yards

1.5m (front), 1m (side and rear)

HIRB

4m+60°

4 - storeys

5 - storeys

6 - storeys

7 - storeys

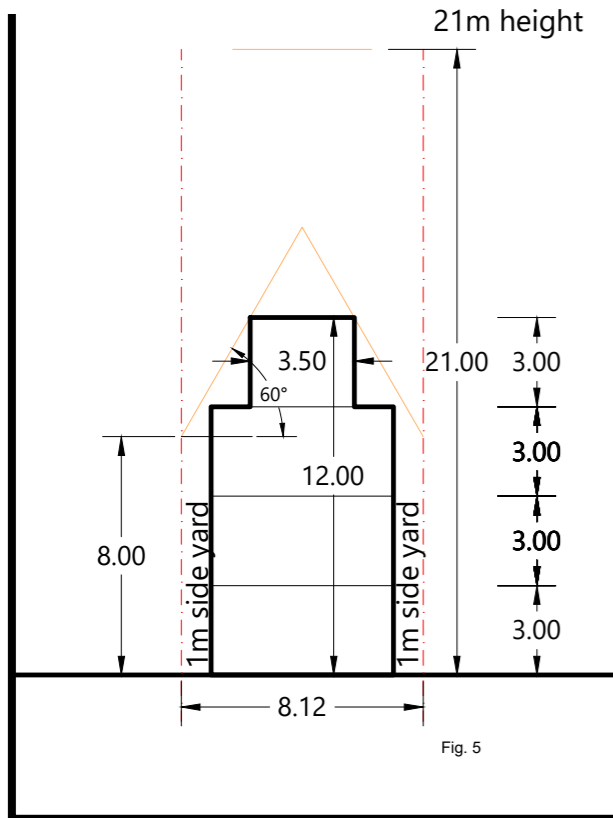


Fig. 5

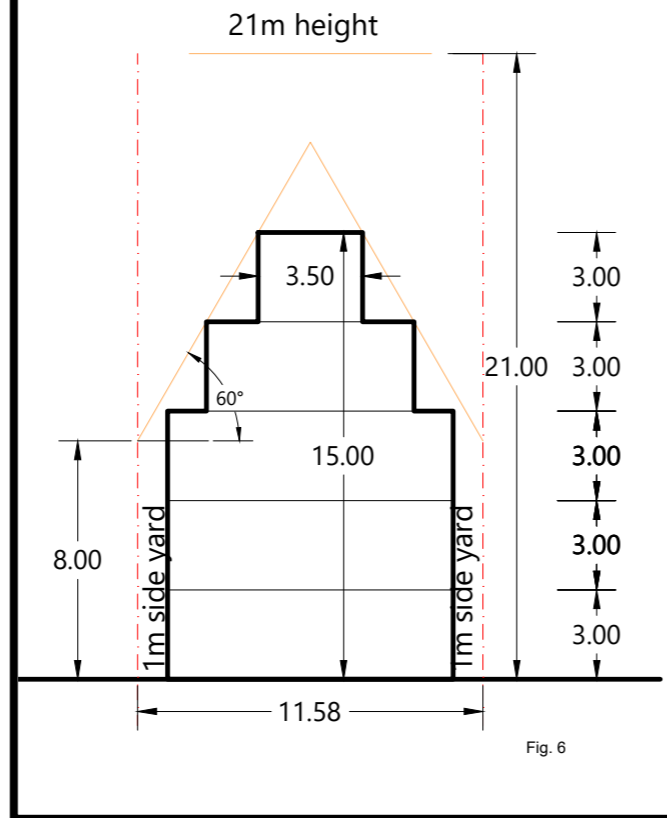


Fig. 6

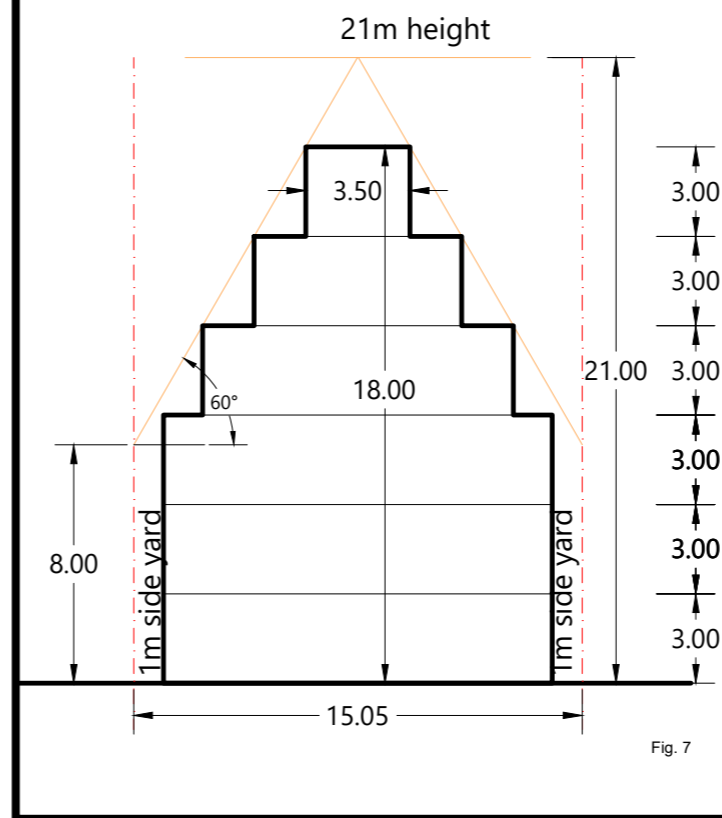


Fig. 7

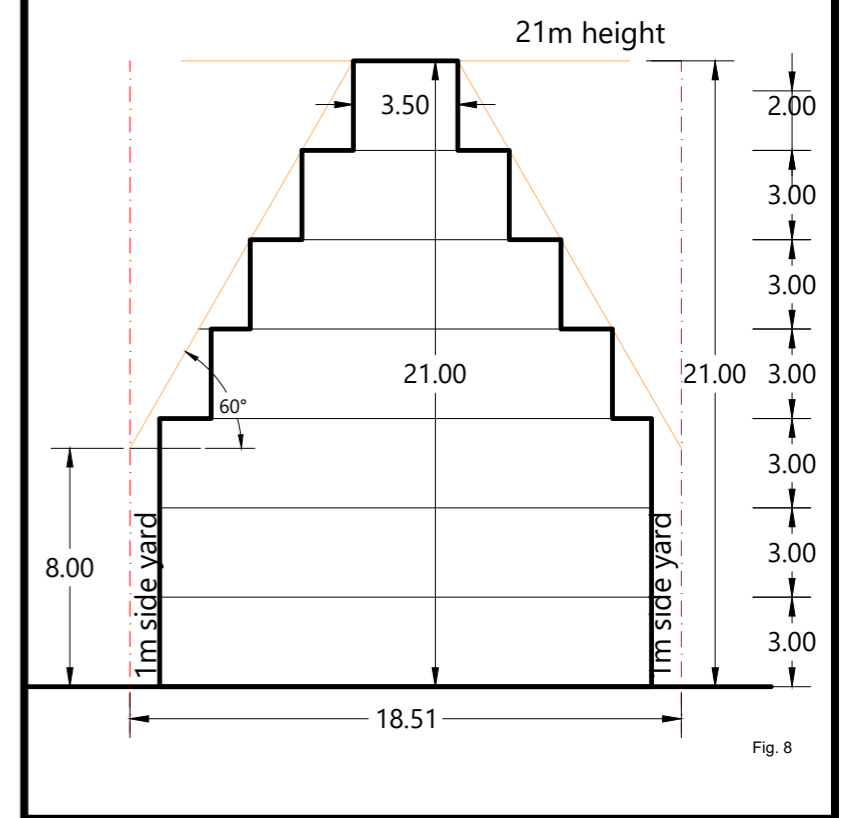


Fig. 8

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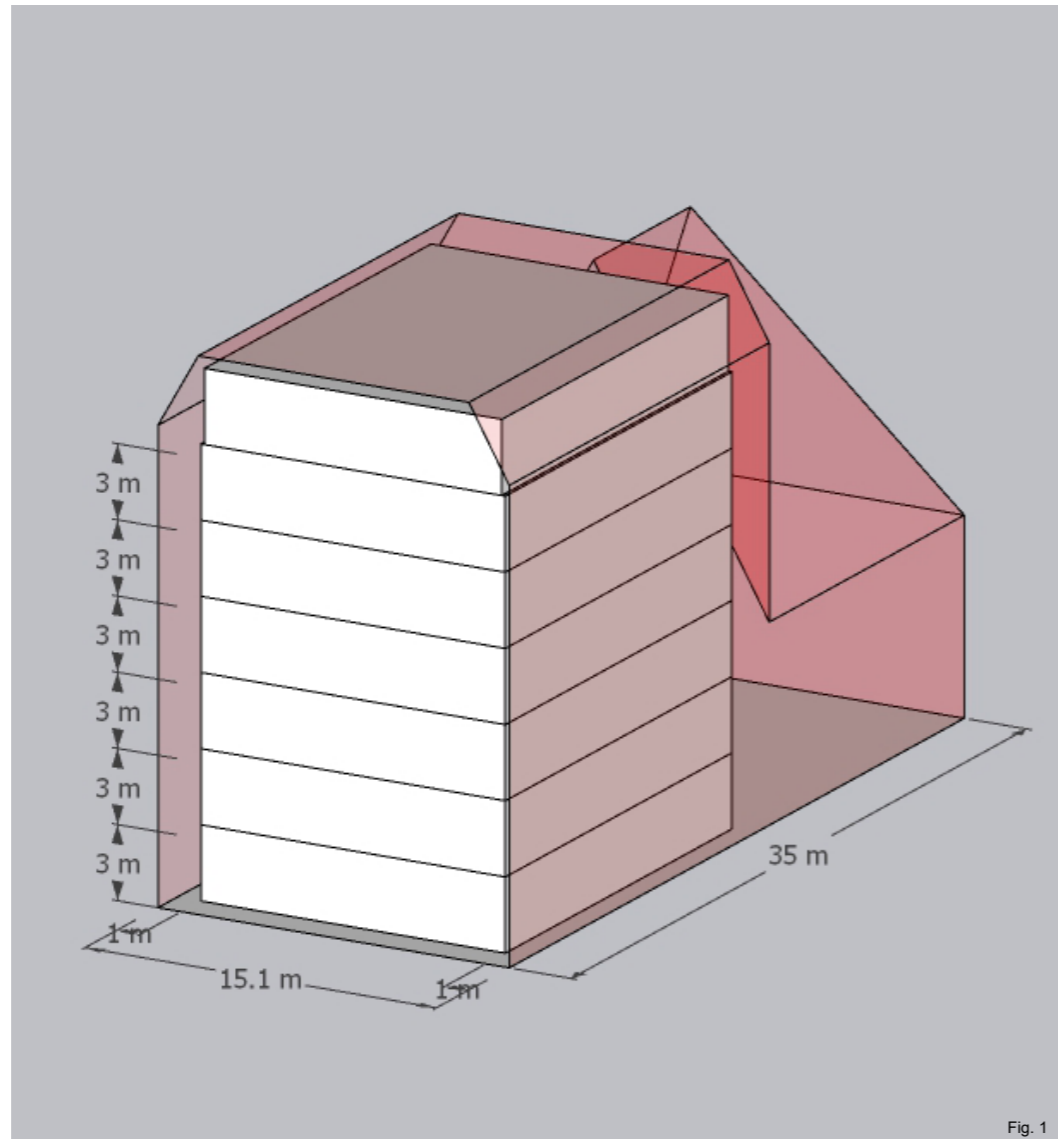
HEIGHT VS SITE WIDTH - HRZ PDP - MINIMUM SITE FRONTAGE INVESTIGATION

HIRB CASE STUDY

Kainga Ora

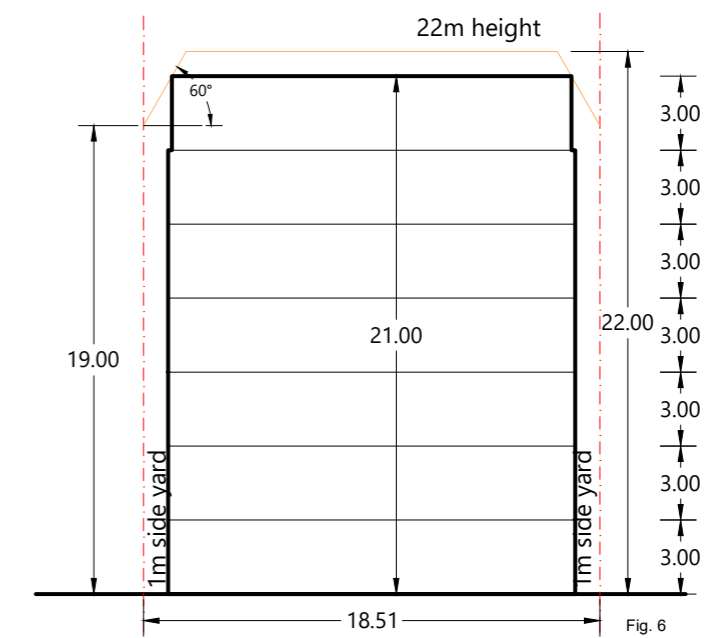
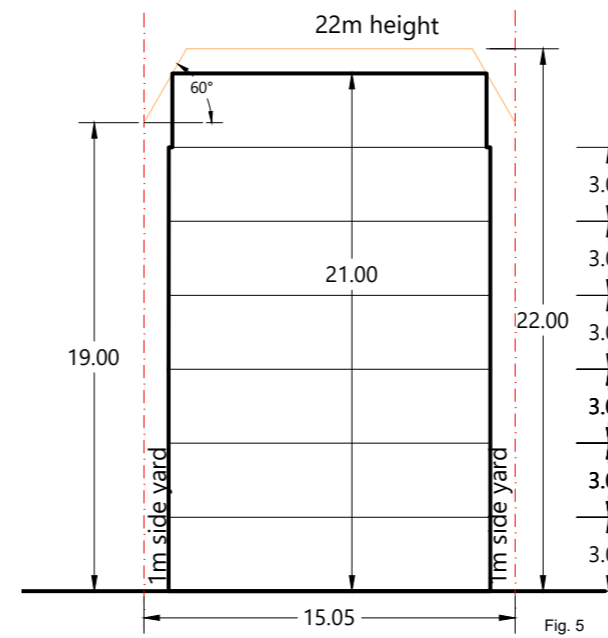
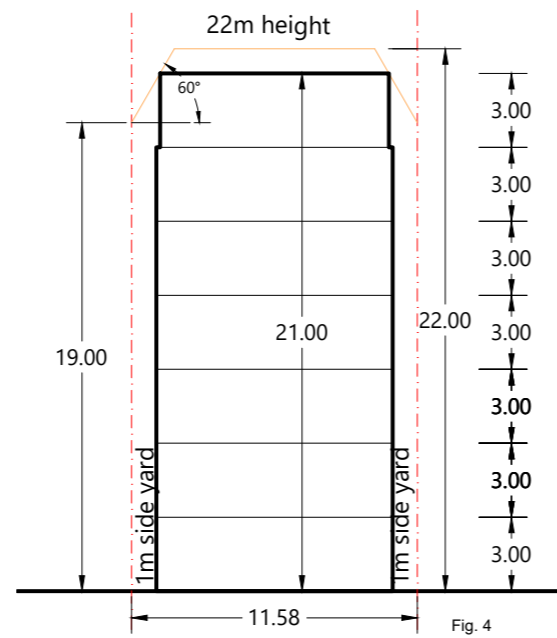
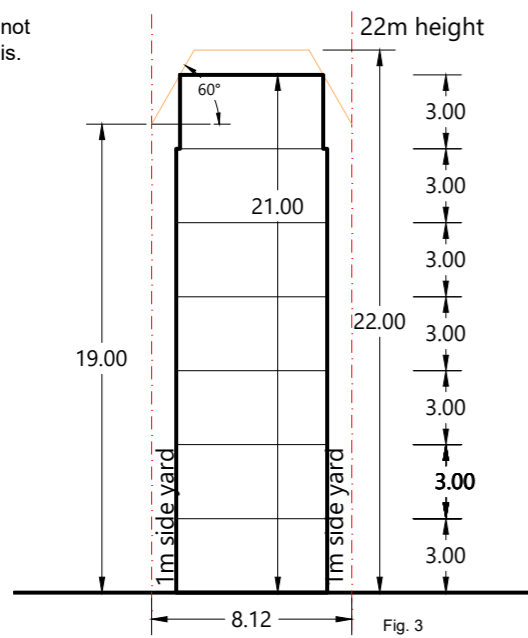
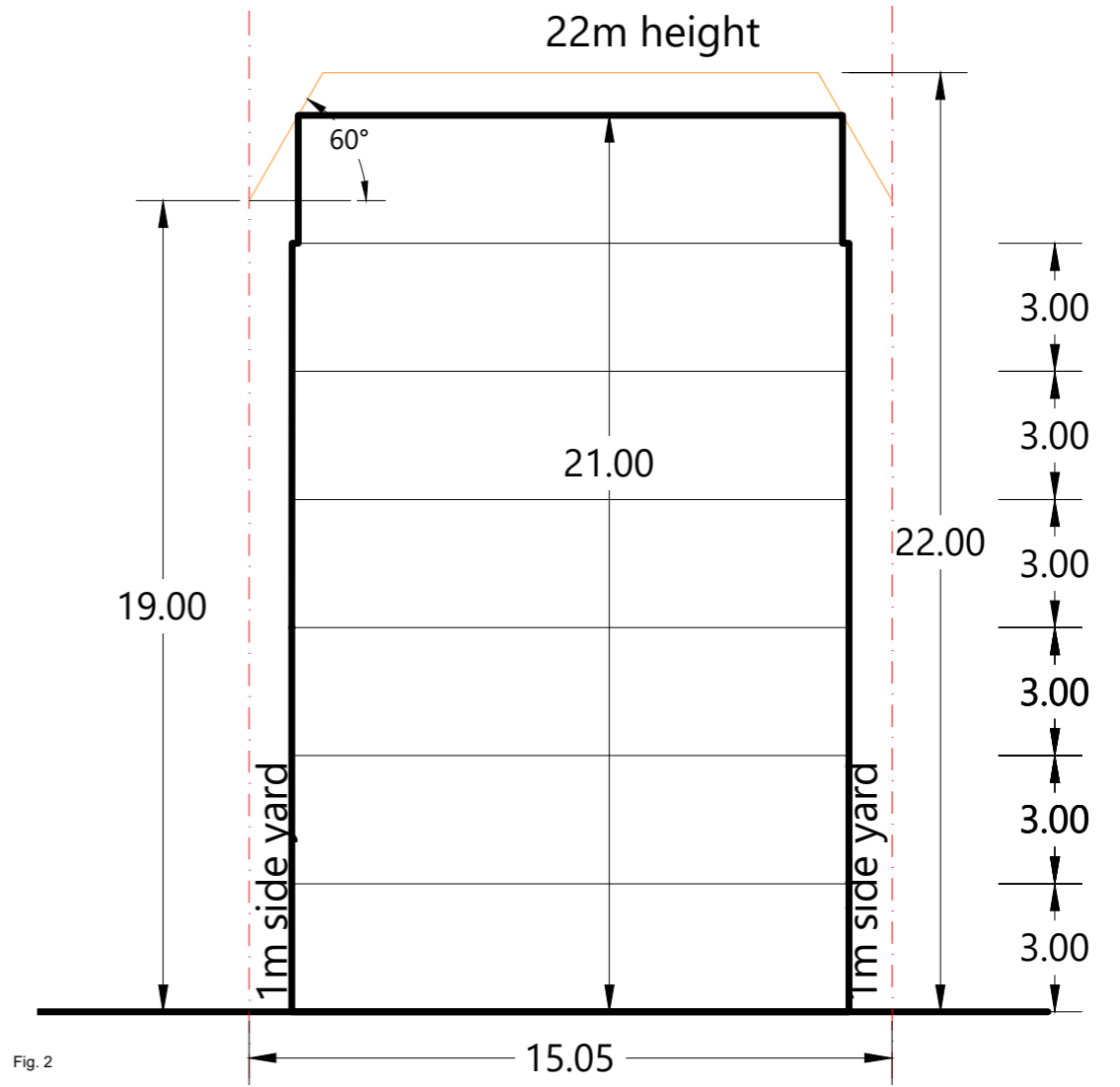
Date : 17 March 2023

SK09
Rev 0



HRZ - KO
 Height
 22m
 Building Coverage
 50%
 Yards
 1.5m (front), 1m (side and rear)
 HIRB
 19m+60° (22m) - 8+60°

Note:
 Kainga Ora accept S42a
 height of 21m. Model has not
 been adjusted to reflect this.



Disclaimer:
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HEIGHT VS SITE WIDTH - HRZ KAINGA ORA - MINIMUM SITE FRONTAGE TO PERMIT 6-STOREYS

HIRB CASE STUDY

Kainga Ora

Date : 17 March 2023

SK10
 Rev 0

29m Height Overlay

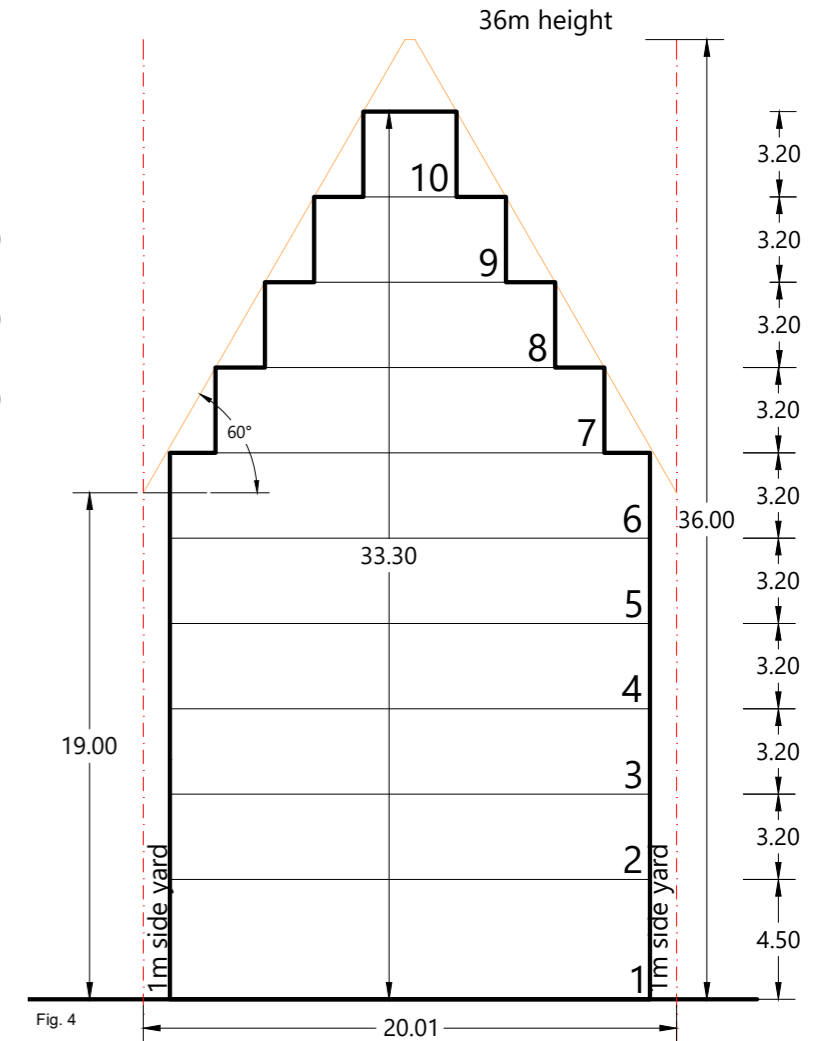
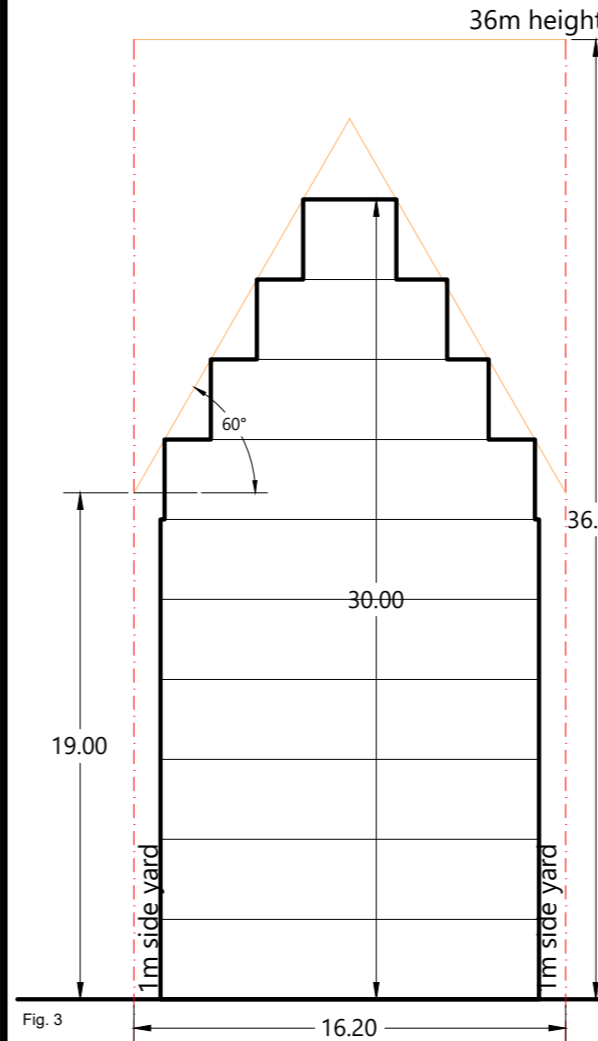
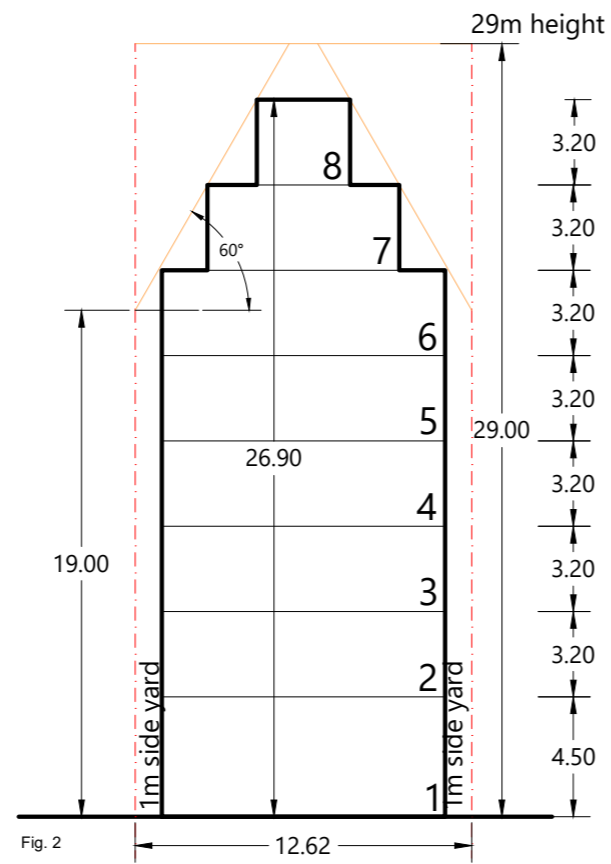
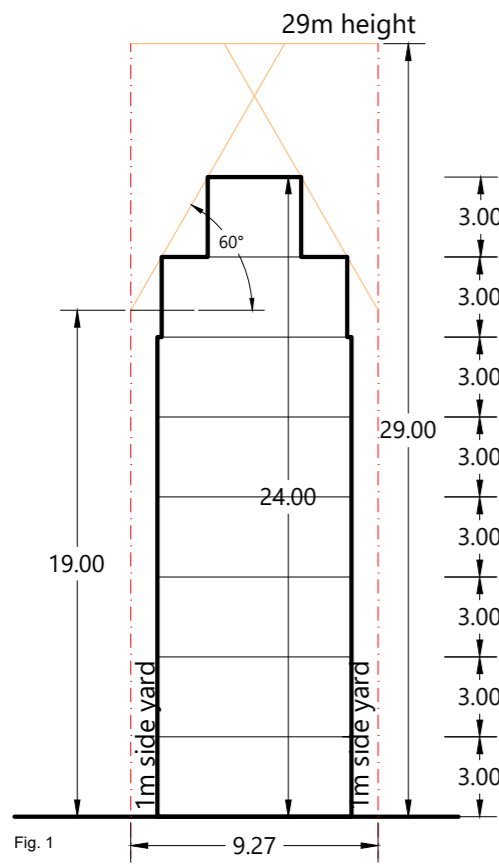
36m Height Overlay

MINIMUM SITE WIDTH TO PERMIT 8-STOREYS
3m floor to floor

MINIMUM SITE WIDTH TO PERMIT 8-STOREYS
4.5m floor to floor (ground floor)
3.2m floor to floor (above ground floor)

MINIMUM SITE WIDTH TO PERMIT 8-STOREYS
3m floor to floor

MINIMUM SITE WIDTH TO PERMIT 8-STOREYS
4.5m floor to floor (ground floor)
3.2m floor to floor (above ground floor)



HRZ-KO
Height
29-36m
Building Coverage
50%
Yards
1.5m (front), 1m (side and rear)
HIRB
19m+60° (22m) - 8+60°

Disclaimer:
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Images generated from the 3D model with no specific scale. This
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HEIGHT VS SITE WIDTH - KAINGA ORA 29m and 36m Height Overlay

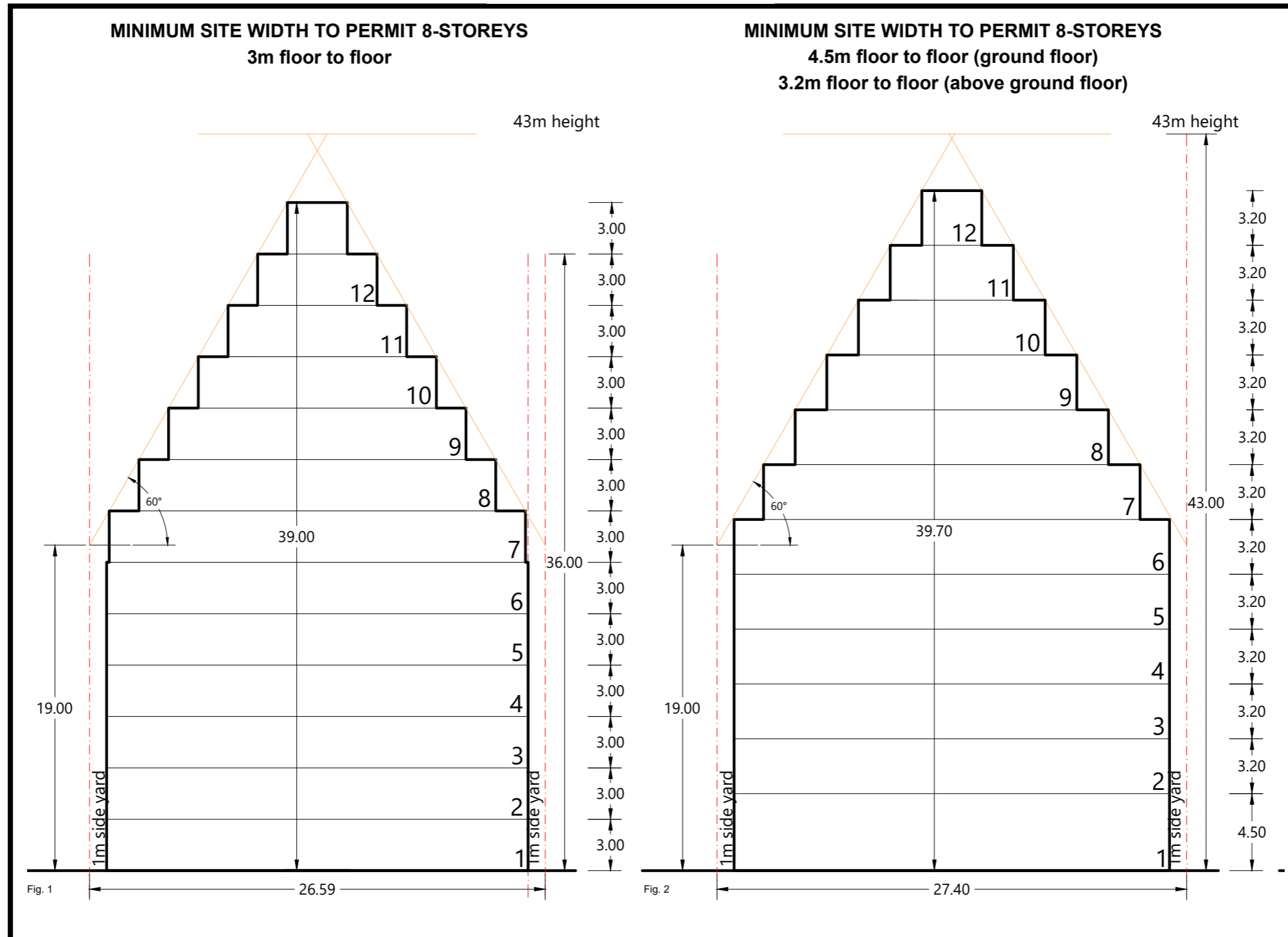
HIRB CASE STUDY

Kainga Ora

Date : 17 March 2023

SK11
Rev 0

43m Height Overlay



HRZ-KO
Height
43m
Building Coverage
50%
Yards
1.5m (front), 1m (side and rear)
HIRB
19m+60° (22m) - 8+60°

Disclaimer:
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HEIGHT VS SITE WIDTH - KAINGA ORA 43m Height Overlay

HIRB CASE STUDY

Kainga Ora


Date : 17 March 2023

SK12
Rev 0



ADJUSTED ZONE MAPS










Public Transport

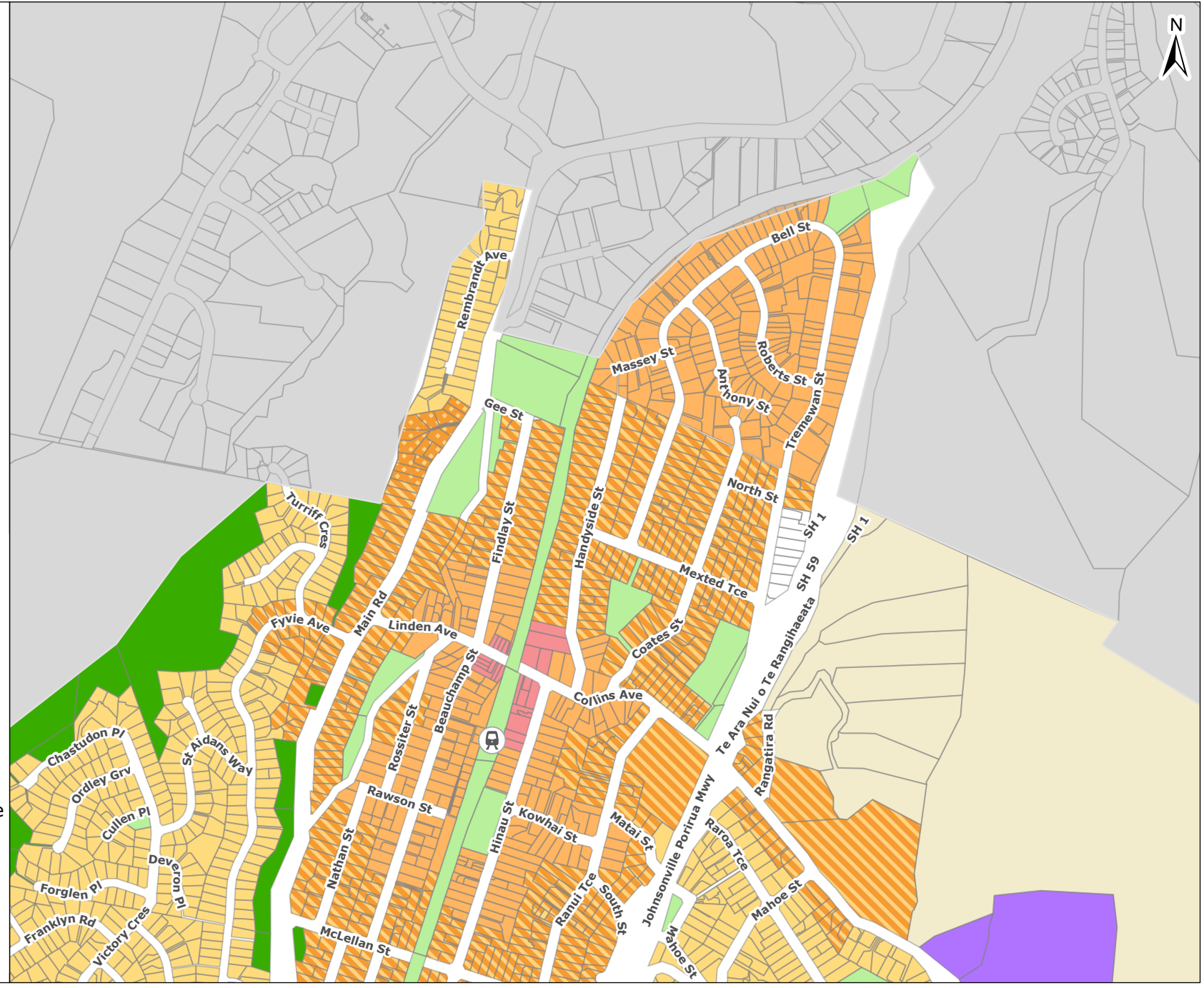
 Train Station

Kāinga Ora Proposed Changes Sought

-  High Density Residential
-  High Density Residential (Additional Areas)

Proposed District Plan Zones

-  Large Lot Residential Zone
-  Medium Density Residential Zone
-  High Density Residential Zone
-  Local Centre Zone
-  General Industrial Zone
-  Natural Open Space Zone
-  Open Space Zone

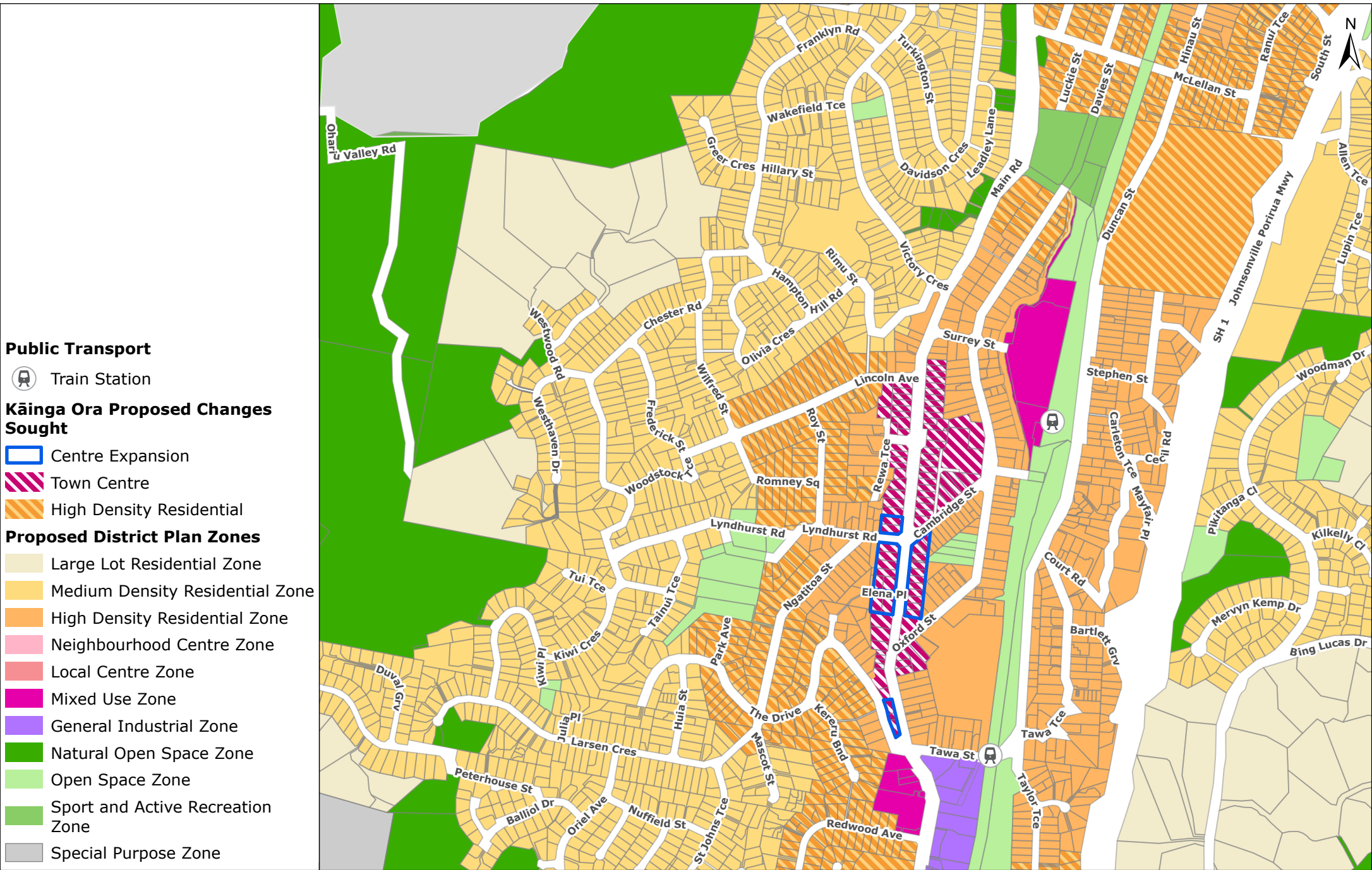


Imagery sourced from: LINZ Data Services
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Linden
 Proposed Classification: Local Centre
 Submission Classification: Local Centre

PREPARED BY	TPG REF.	718448
Conor McIntosh	SHEET	1 OF 24
DATE	17/03/2023	A4 Scale 1:10,000
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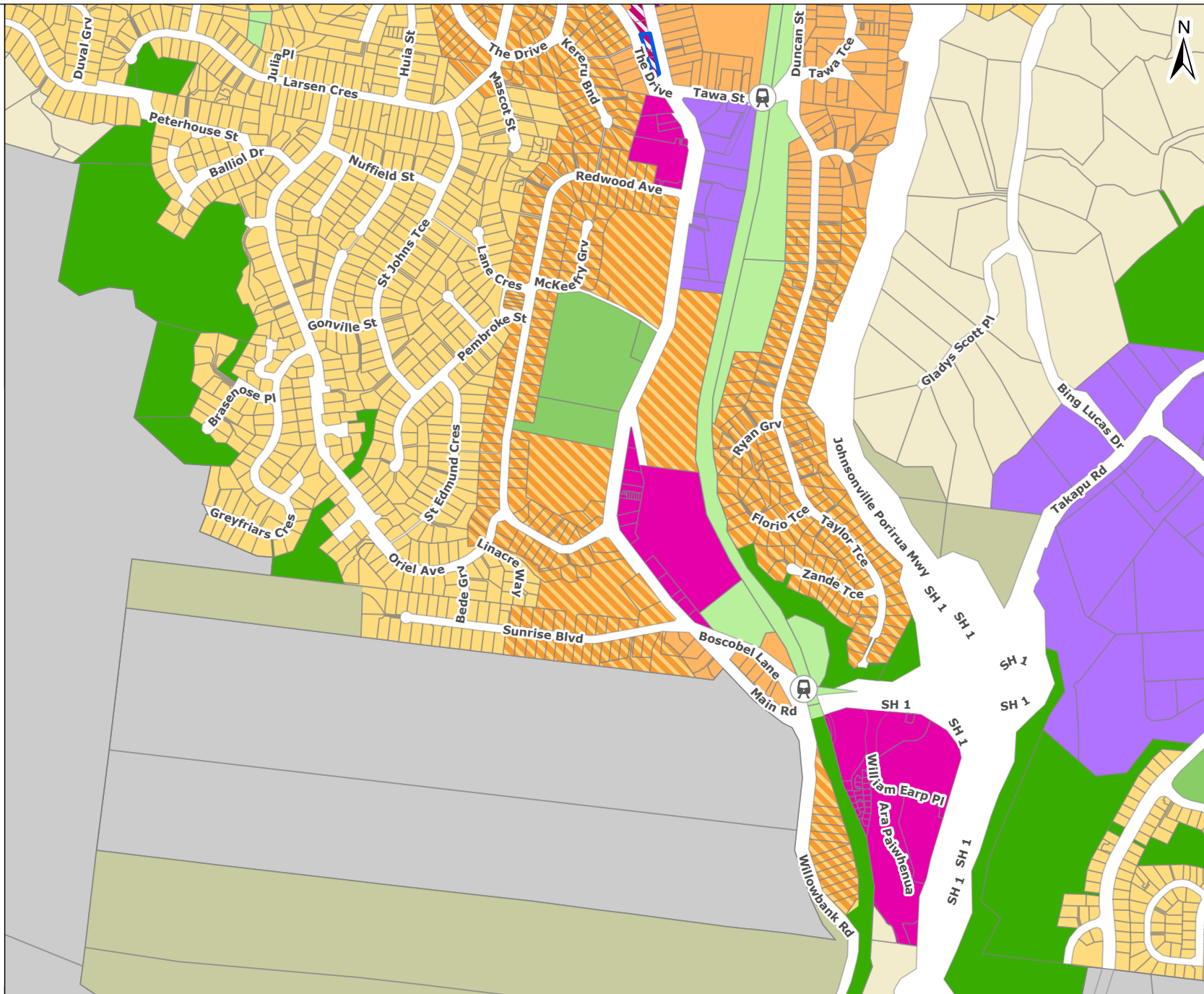


Imagery sourced from: LINZ Data Services
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

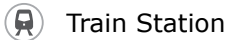
Centre: Tawa (North)
 Proposed Classification: Local Centre
 Submission Classification: Town Centre

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A4 Scale 1:10,000	
0 260 Metres	

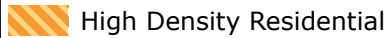
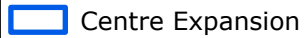
Kāinga Ora
Homes and Communities



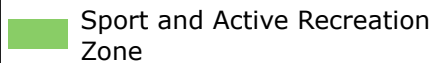
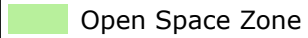
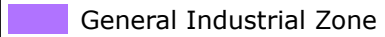
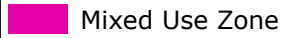
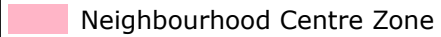
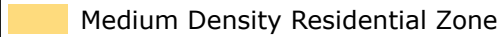
Public Transport



Kāinga Ora Proposed Changes Sought



Proposed District Plan Zones



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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).



Centre: Tawa (South)
 Proposed Classification: Local Centre
 Submission Classification: Town Centre

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17/03/2023	3 OF 24
A4 Scale 1:10,000	
0	260 Metres












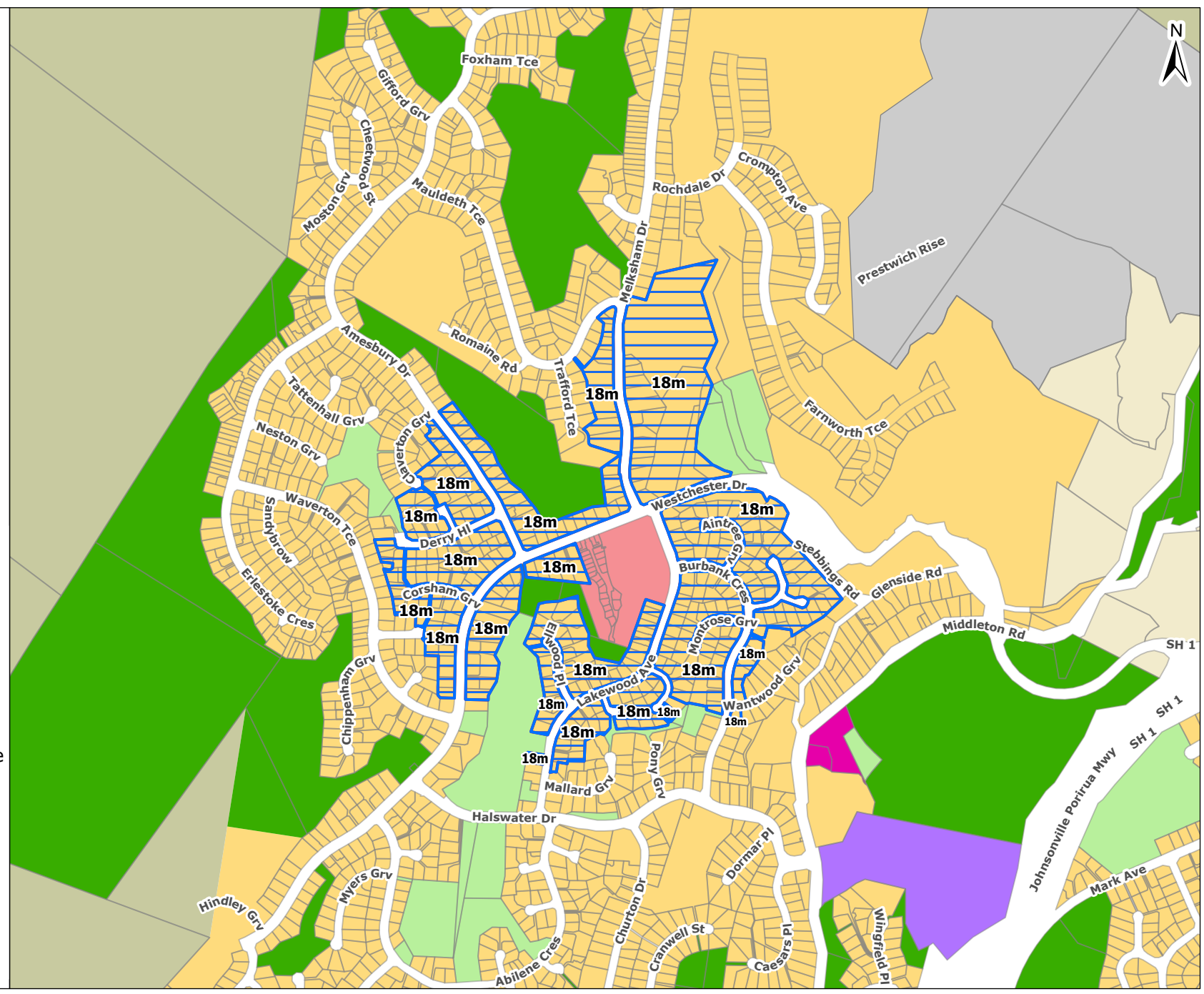


Kāinga Ora Proposed Changes Sought

-  Expansion to Council Proposed Height Control Area
-  Height Increase to Council Proposed Height Control Area

Proposed District Plan Zones

-  Large Lot Residential Zone
-  Medium Density Residential Zone
-  General Rural Zone
-  Local Centre Zone
-  Mixed Use Zone
-  General Industrial Zone
-  Natural Open Space Zone
-  Open Space Zone
-  Special Purpose Zone

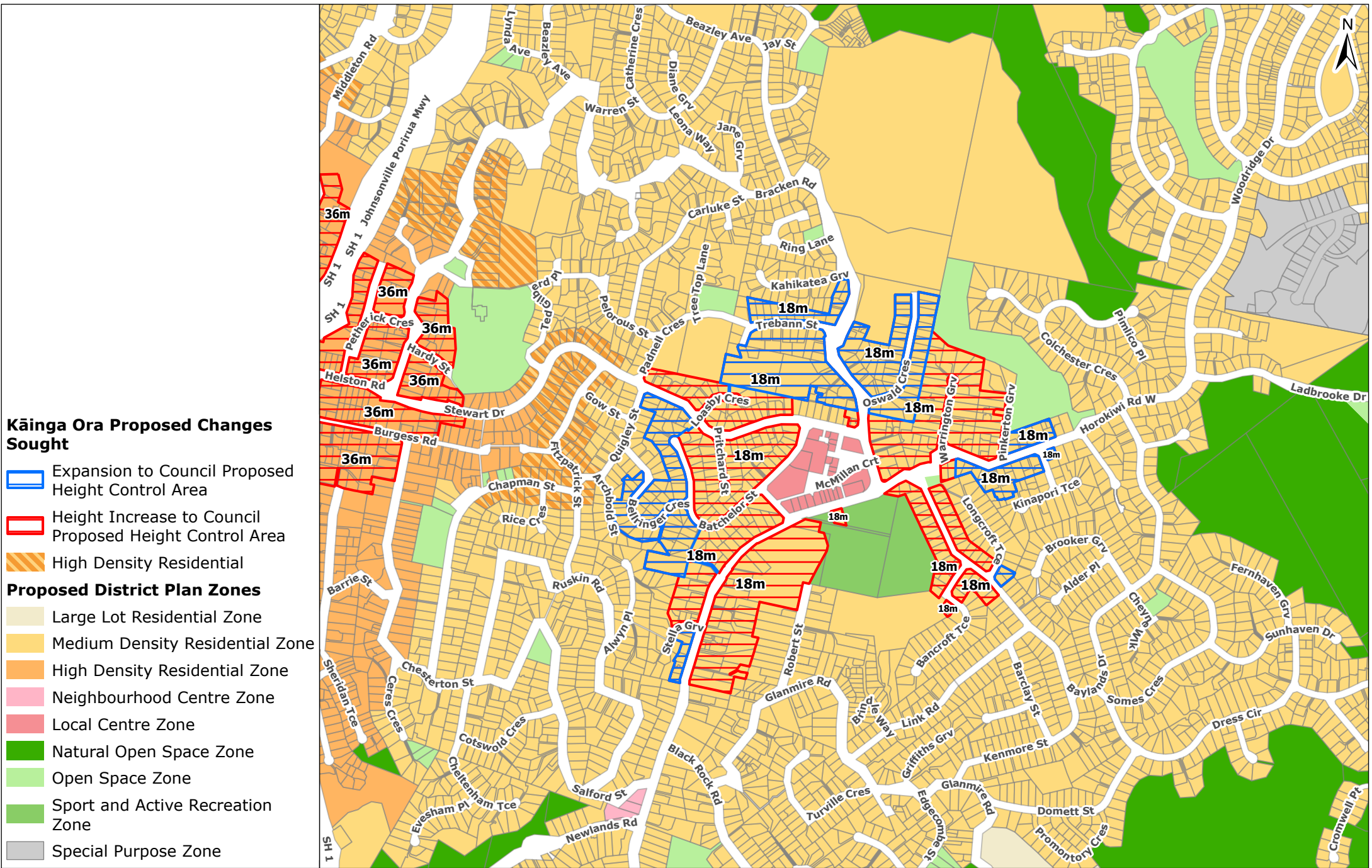


Imagery sourced from: LINZ Data Services
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Churton Park
 Proposed Classification: Local Centre
 Submission Classification: Local Centre

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DATE	SHEET
17/03/2023	4 OF 24
A4 Scale 1:10,000	
0 260 Metres	





Kāinga Ora Proposed Changes Sought

- Expansion to Council Proposed Height Control Area
- Height Increase to Council Proposed Height Control Area
- High Density Residential

Proposed District Plan Zones

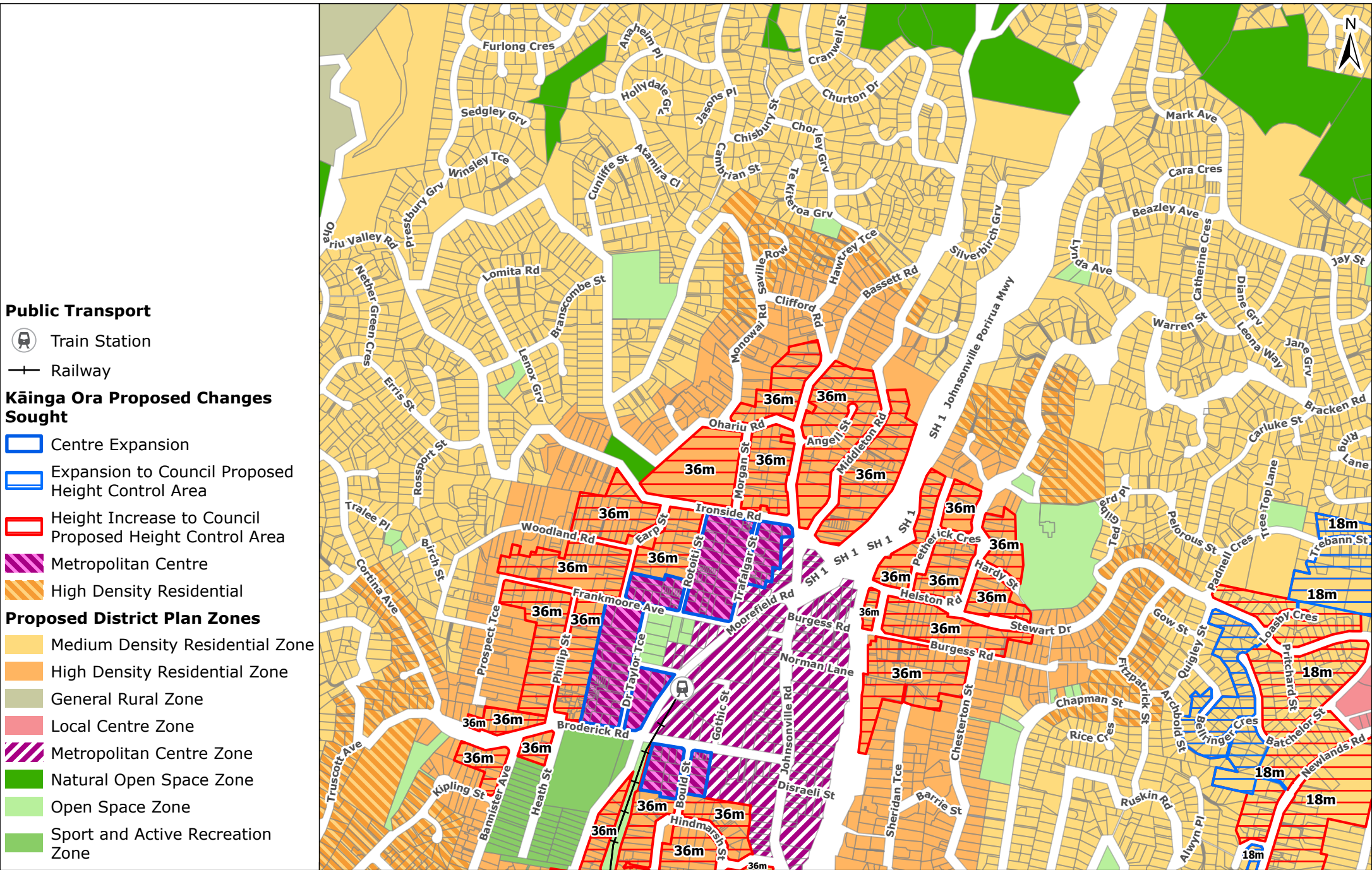
- Large Lot Residential Zone
- Medium Density Residential Zone
- High Density Residential Zone
- Neighbourhood Centre Zone
- Local Centre Zone
- Natural Open Space Zone
- Open Space Zone
- Sport and Active Recreation Zone
- Special Purpose Zone

Imagery sourced from: LINZ Data Services
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Newlands
 Proposed Classification: Local Centre
 Submission Classification: Local Centre

PREPARED BY	TPG REF. 718448
Conor McIntosh	SHEET 5 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres



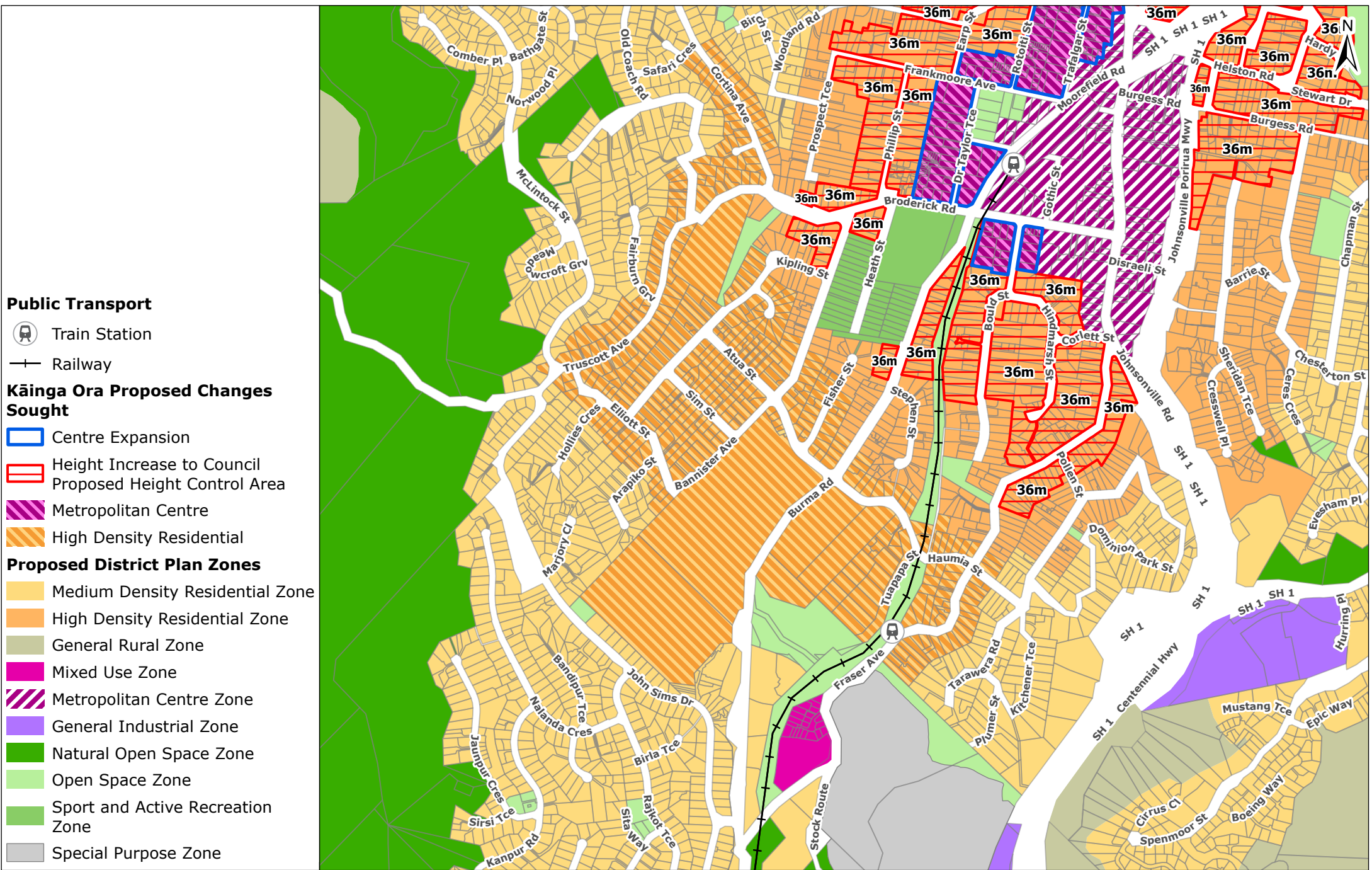


Imagery sourced from: LINZ Data Services
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Johnsonville (North)
 Proposed Classification: Metropolitan Centre
 Submission Classification: Metropolitan Centre

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Conor McIntosh	718448
DATE	SHEET
17/03/2023	6 OF 24
	A4 Scale 1:10,000
0	260 Metres

Kāinga Ora
Homes and Communities



Public Transport

- Train Station
- Railway

Kāinga Ora Proposed Changes Sought

- Centre Expansion
- Height Increase to Council Proposed Height Control Area
- Metropolitan Centre
- High Density Residential

Proposed District Plan Zones

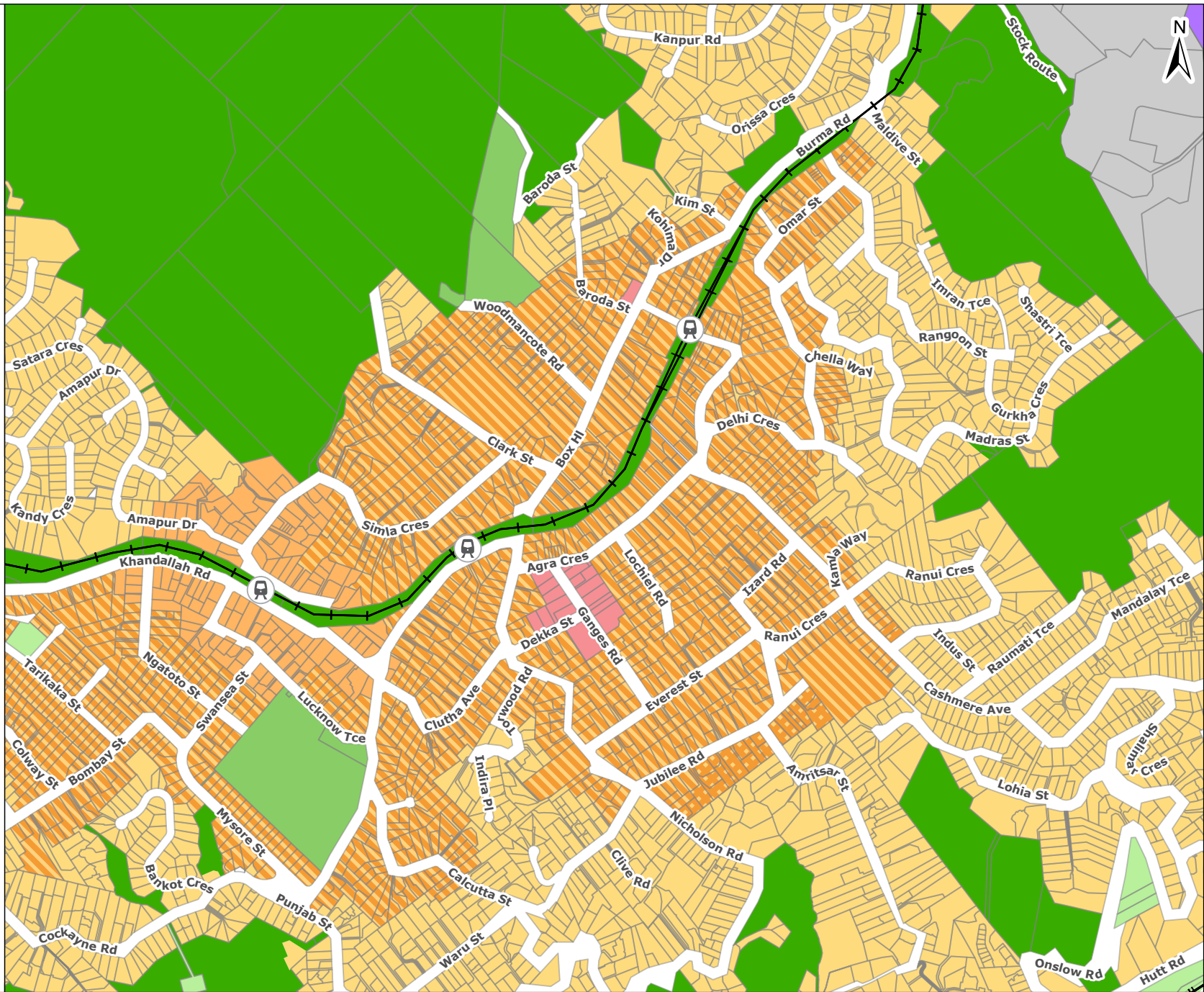
- Medium Density Residential Zone
- High Density Residential Zone
- General Rural Zone
- Mixed Use Zone
- Metropolitan Centre Zone
- General Industrial Zone
- Natural Open Space Zone
- Open Space Zone
- Sport and Active Recreation Zone
- Special Purpose Zone

Imagery sourced from: LINZ Data Services
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Johnsonville (South)
 Proposed Classification: Metropolitan Centre
 Submission Classification: Metropolitan Centre

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Conor McIntosh	718448
DATE	SHEET
17/03/2023	7 OF 24
A4 Scale 1:10,000	
0 260 Metres	





Public Transport

- Train Station
- Railway

Kāinga Ora Proposed Changes Sought

- High Density Residential
- High Density Residential (Additional Areas)

Proposed District Plan Zones

- Medium Density Residential Zone
- Local Centre Zone
- General Industrial Zone
- Natural Open Space Zone
- Open Space Zone
- Sport and Active Recreation Zone
- Special Purpose Zone
- High Density Residential Zone

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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Khandallah
 Proposed Classification: Local Centre
 Submission Classification: Local Centre

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DATE	SHEET
17/03/2023	8 OF 24
A4 Scale 1:10,000	
0 260 Metres	





Public Transport

- Train Station
- Railway

Kāinga Ora Proposed Changes Sought

- High Density Residential
- Medium Density Residential Zone
- General Rural Zone
- Neighbourhood Centre Zone
- Local Centre Zone
- Natural Open Space Zone
- Open Space Zone
- Sport and Active Recreation Zone
- High Density Residential Zone

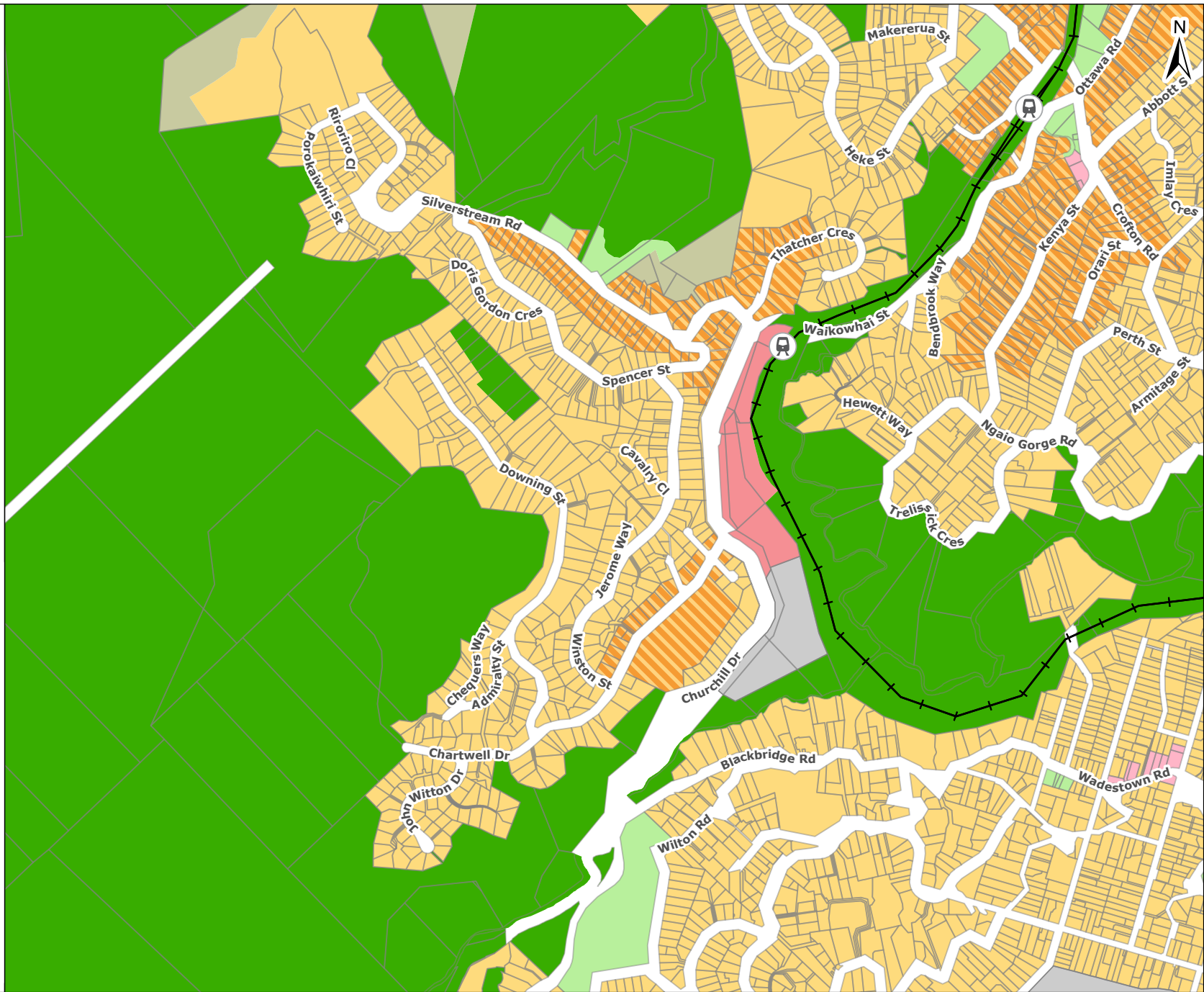


Centre: Ngaio
 Proposed Classification: Local Centre
 Submission Classification: Local Centre



PREPARED BY	TPG REF. 718448
Conor McIntosh	SHEET 9 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres

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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).













Public Transport

-  Train Station
-  Railway

Kāinga Ora Proposed Changes Sought

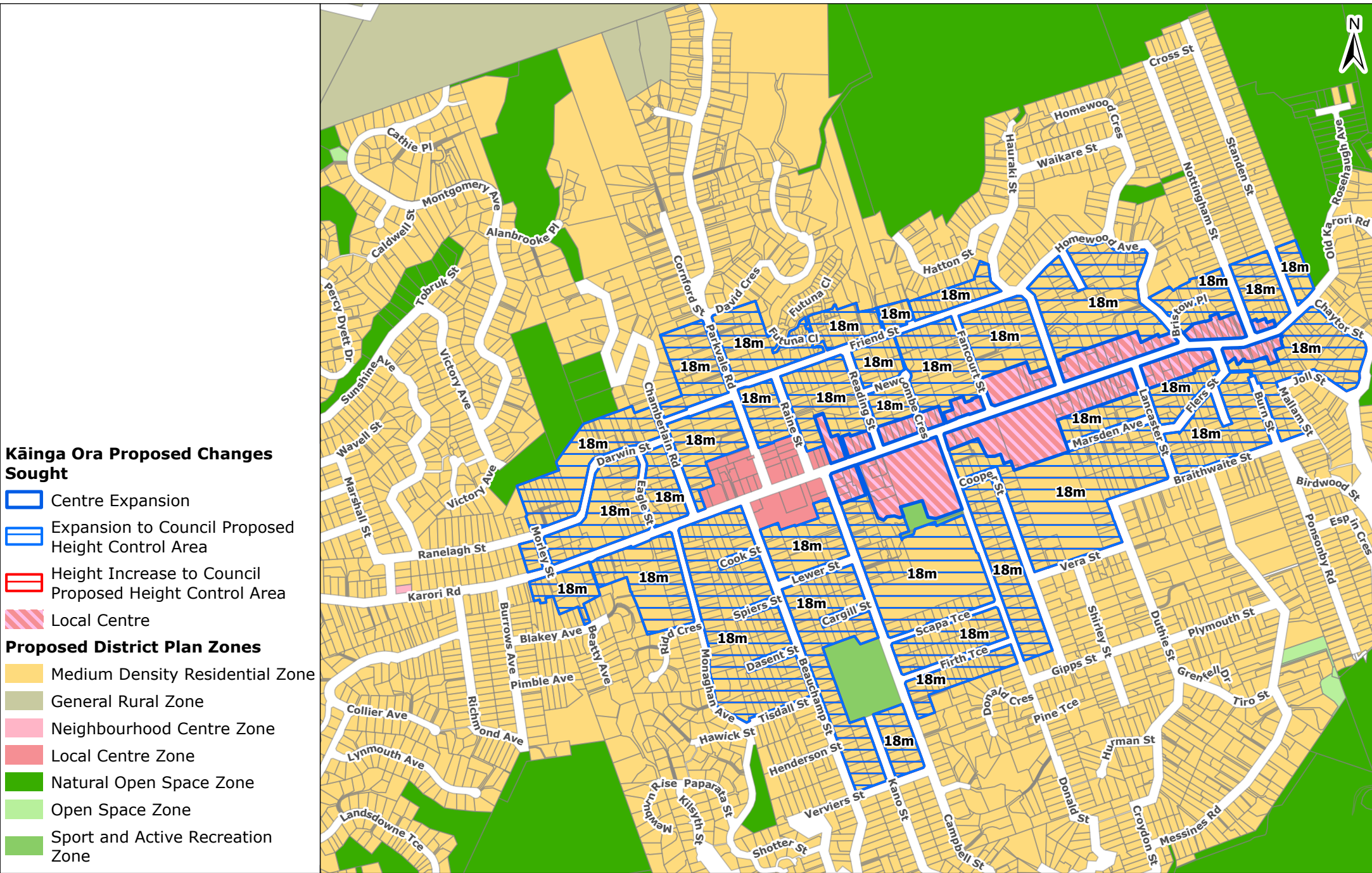
-  High Density Residential
-  Medium Density Residential Zone
-  General Rural Zone
-  Neighbourhood Centre Zone
-  Local Centre Zone
-  Natural Open Space Zone
-  Open Space Zone
-  Special Purpose Zone

Imagery sourced from: LINZ Data Services
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Crofton Downs
 Proposed Classification: Local Centre
 Submission Classification: Local Centre

PREPARED BY	TPG REF. 718448
Conor McIntosh	SHEET 10 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres





Kāinga Ora Proposed Changes Sought

- Centre Expansion
- Expansion to Council Proposed Height Control Area
- Height Increase to Council Proposed Height Control Area
- Local Centre

Proposed District Plan Zones

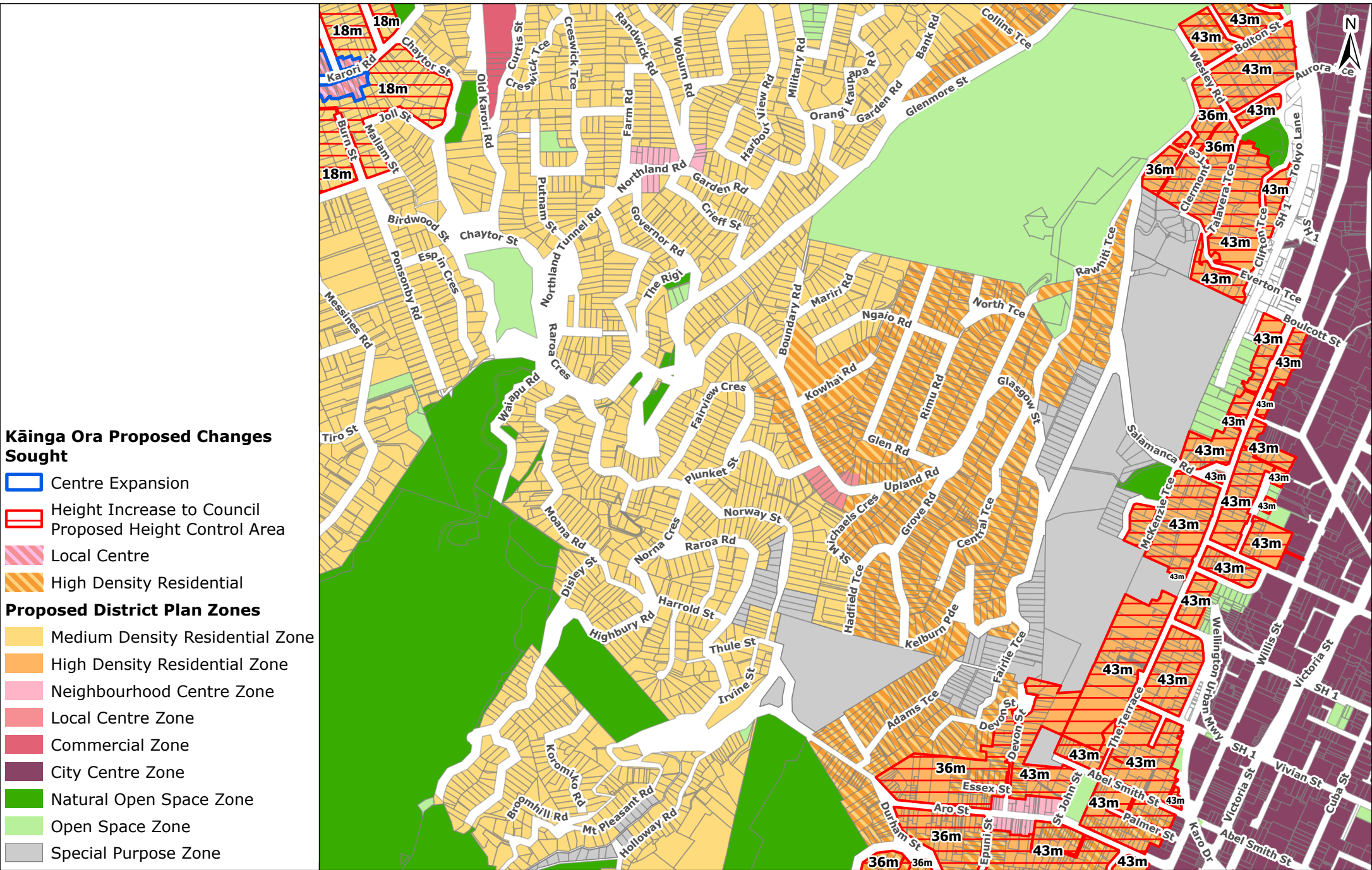
- Medium Density Residential Zone
- General Rural Zone
- Neighbourhood Centre Zone
- Local Centre Zone
- Natural Open Space Zone
- Open Space Zone
- Sport and Active Recreation Zone

Imagery sourced from: LINZ Data Services
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Karori
 Proposed Classification: Local Centre
 Submission Classification: Local Centre (Expanded)

PREPARED BY	TPG REF. 718448
Conor McIntosh	SHEET 11 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres







Imagery sourced from: LINZ Data Services
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Kelburn
 Proposed Classification: Local Centre
 Submission Classification: Local Centre



PREPARED BY	TPG REF.
Conor McIntosh	718448
DATE	SHEET
17/03/2023	12 OF 24
	A4 Scale 1:10,000
0	260 Metres











Public Transport

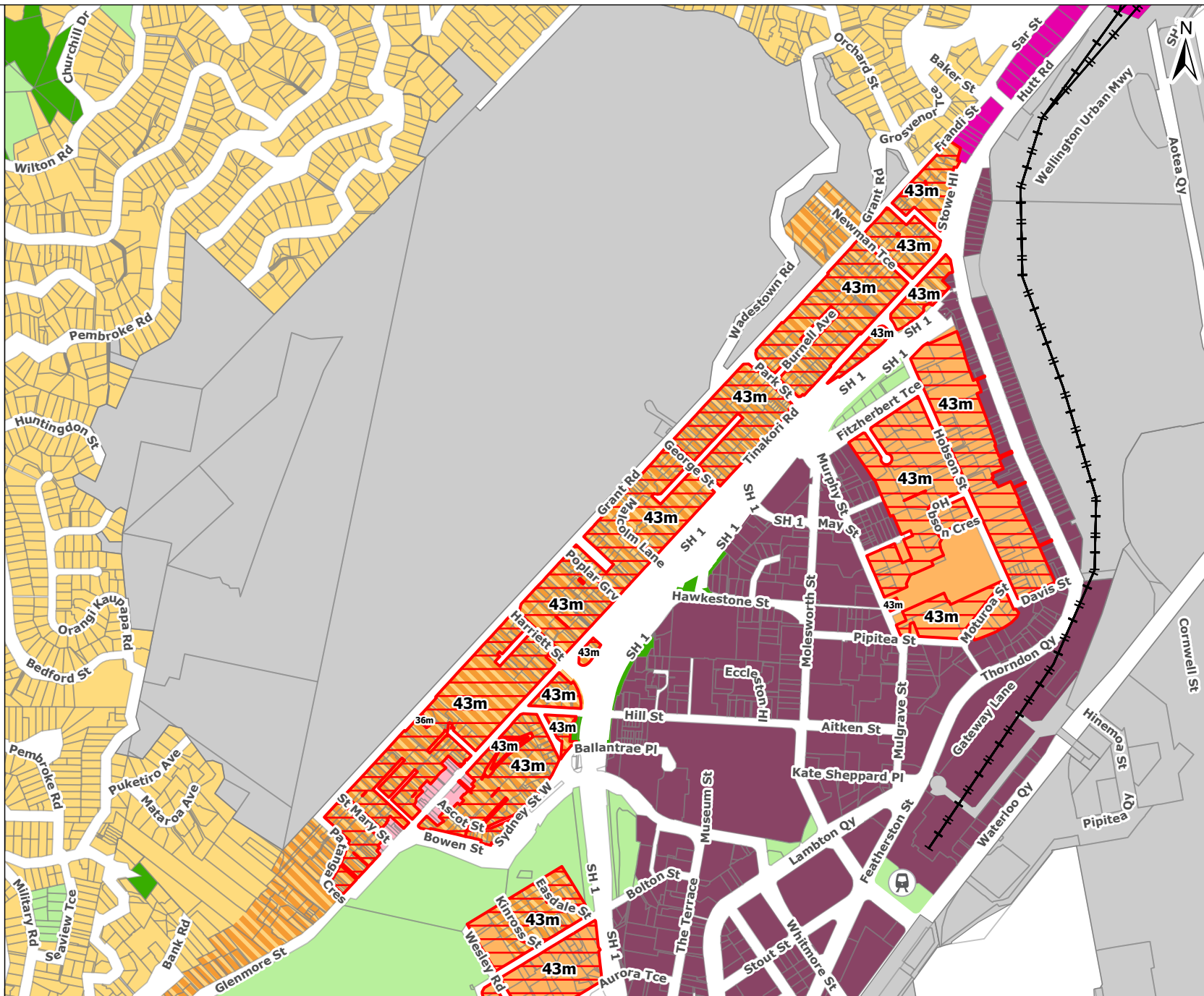
-  Train Station
-  Railway

Kāinga Ora Proposed Changes Sought

-  Height Increase to Council Proposed Height Control Area
-  High Density Residential

Proposed District Plan Zones

-  Medium Density Residential Zone
-  High Density Residential Zone
-  Neighbourhood Centre Zone
-  Mixed Use Zone
-  City Centre Zone
-  Natural Open Space Zone
-  Open Space Zone
-  Special Purpose Zone



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 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).


Centre: City Centre (North)
 Proposed Classification: City Centre
 Submission Classification: City Centre


PREPARED BY	TPG REF. 718448
Conor McIntosh	SHEET 13 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres






Kāinga Ora Proposed Changes Sought

 Height Increase to Council Proposed Height Control Area


 High Density Residential

Proposed District Plan Zones


 Medium Density Residential Zone


 High Density Residential Zone

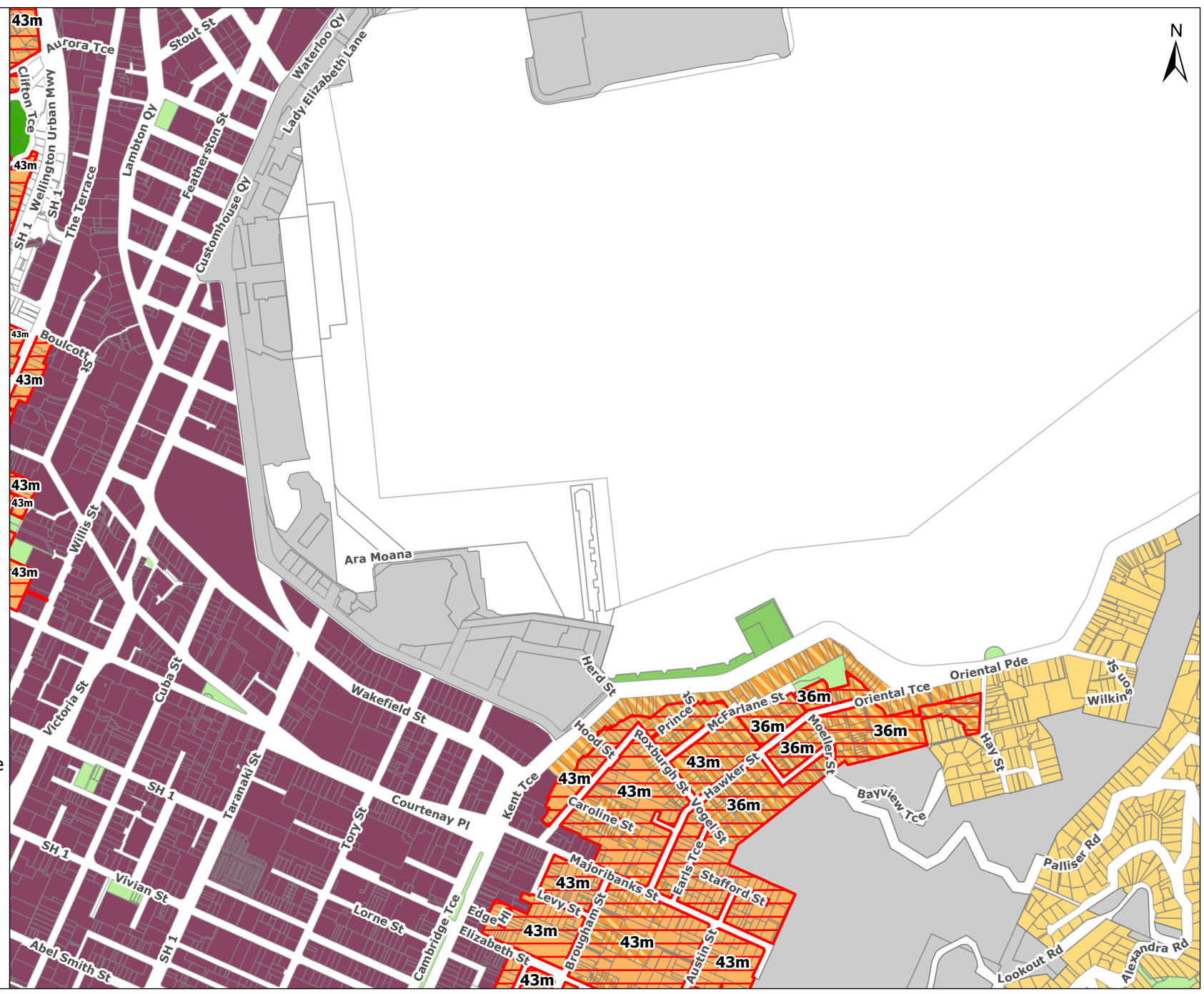
 City Centre Zone

 Natural Open Space Zone

 Open Space Zone

 Sport and Active Recreation Zone

 Special Purpose Zone



Imagery sourced from: LINZ Data Services
Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
Coordinate System: NZGD 2000 New Zealand Transverse Mercator
Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: City Centre (Central)
Proposed Classification: City Centre
Submission Classification: City Centre

PREPARED BY	TPG REF. 718448
Conor McIntosh	SHEET 14 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0 260 Metres	

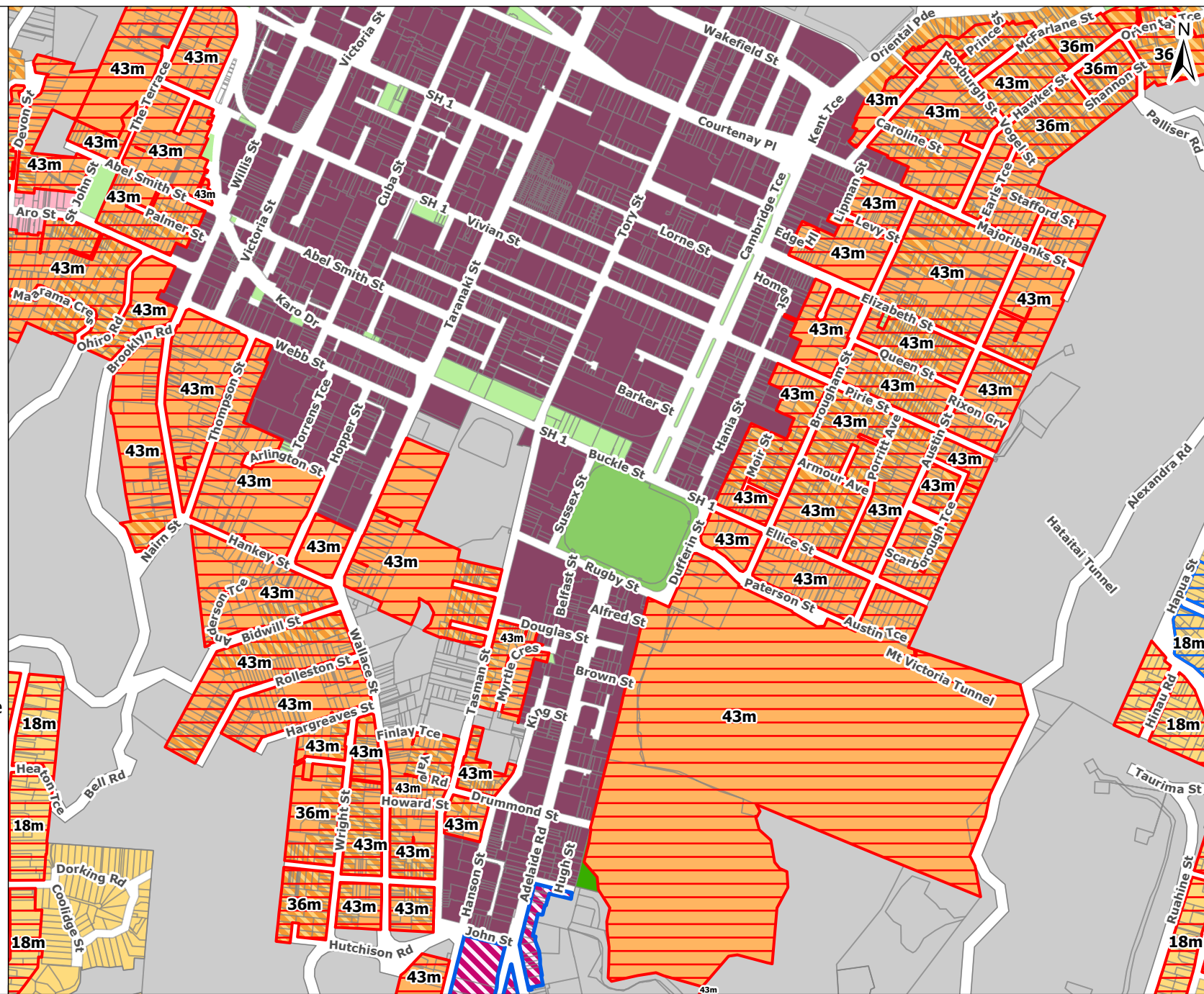


Kāinga Ora Proposed Changes Sought

-  Centre Expansion
-  Expansion to Council Proposed Height Control Area
-  Height Increase to Council Proposed Height Control Area
-  Town Centre
-  High Density Residential

Proposed District Plan Zones

-  Medium Density Residential Zone
-  High Density Residential Zone
-  Neighbourhood Centre Zone
-  Local Centre Zone
-  City Centre Zone
-  Natural Open Space Zone
-  Open Space Zone
-  Sport and Active Recreation Zone
-  Special Purpose Zone




Centre: City Centre (South)
 Proposed Classification: City Centre
 Submission Classification: City Centre


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Conor McIntosh	SHEET 15 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres




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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
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Kāinga Ora Proposed Changes Sought

 Expansion to Council Proposed Height Control Area


 Height Increase to Council Proposed Height Control Area

 High Density Residential


Proposed District Plan Zones

 Medium Density Residential Zone


 High Density Residential Zone

 Neighbourhood Centre Zone

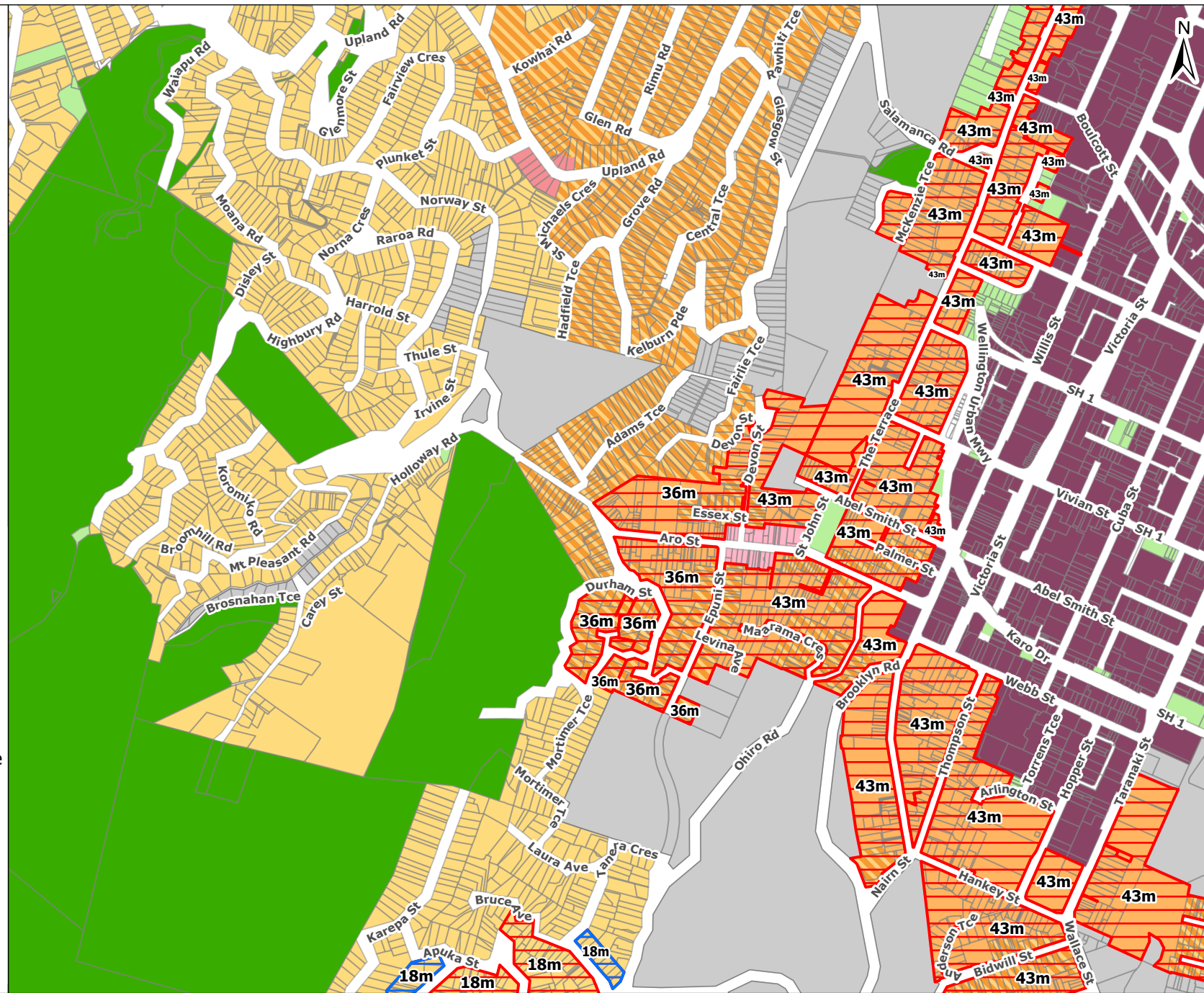
 Local Centre Zone

 City Centre Zone

 Natural Open Space Zone

 Open Space Zone

 Special Purpose Zone



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Centre: Aro Valley
 Proposed Classification: Neighbourhood Centre
 Submission Classification: Local Centre

PREPARED BY	TPG REF. 718448
Conor McIntosh	SHEET 16 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres

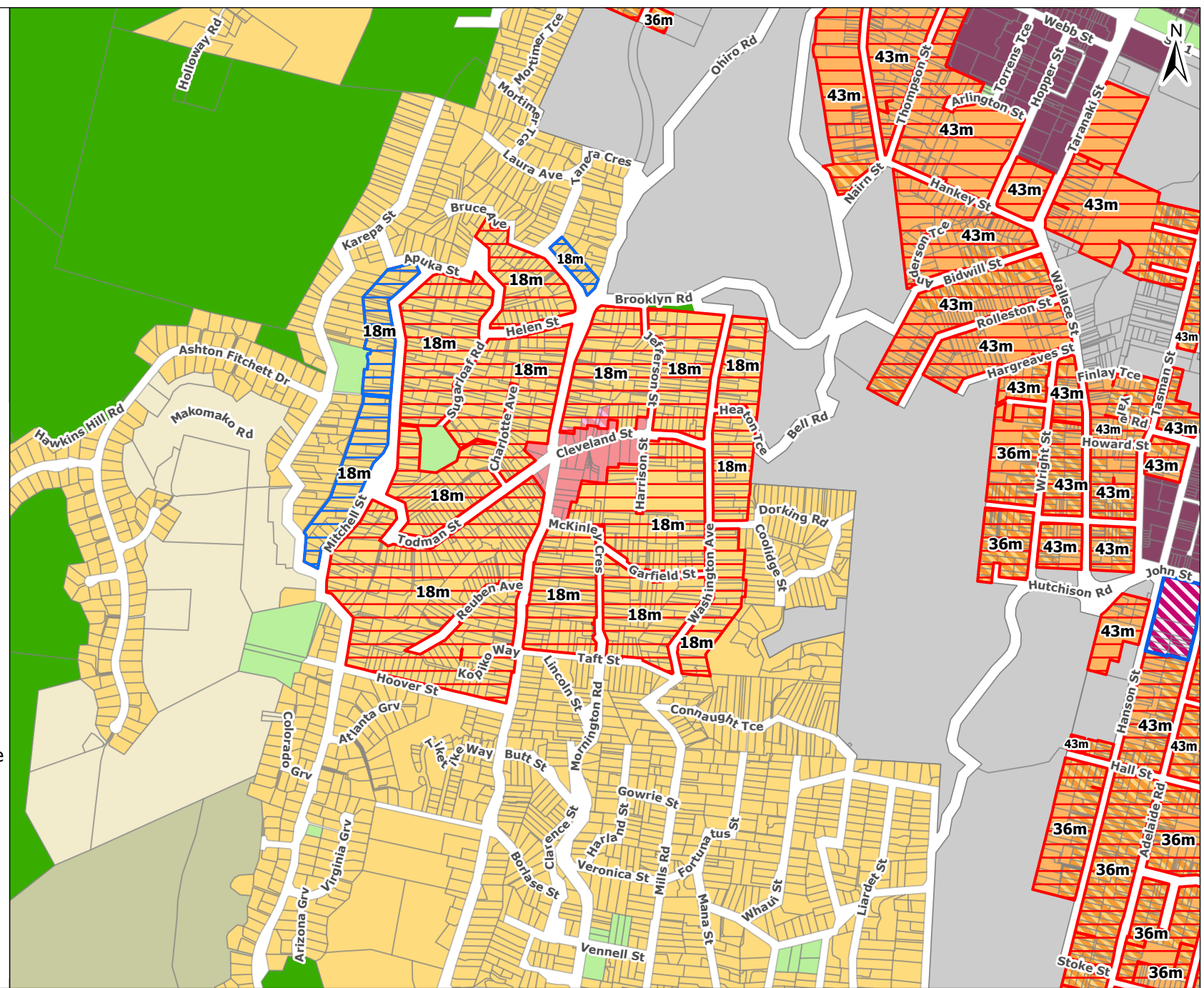


Kāinga Ora Proposed Changes Sought

- Centre Expansion
- Expansion to Council Proposed Height Control Area
- Height Increase to Council Proposed Height Control Area
- Town Centre
- Local Centre
- High Density Residential

Proposed District Plan Zones

- Large Lot Residential Zone
- Medium Density Residential Zone
- High Density Residential Zone
- General Rural Zone
- Local Centre Zone
- City Centre Zone
- Natural Open Space Zone
- Open Space Zone
- Special Purpose Zone

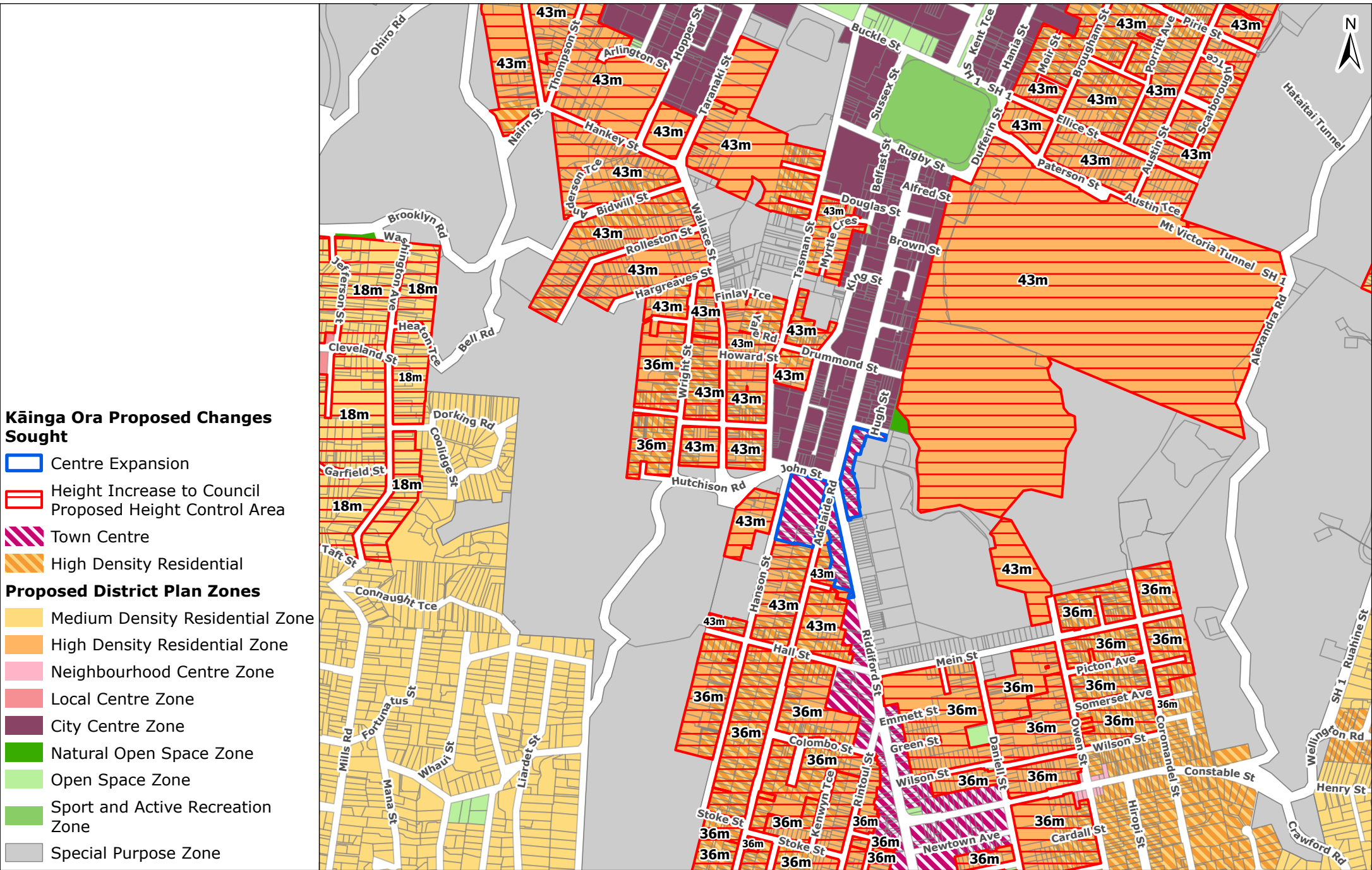


Imagery sourced from: LINZ Data Services
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
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Centre: Brooklyn
 Proposed Classification: Local Centre
 Submission Classification: Local Centre

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Conor McIntosh	SHEET 17 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres



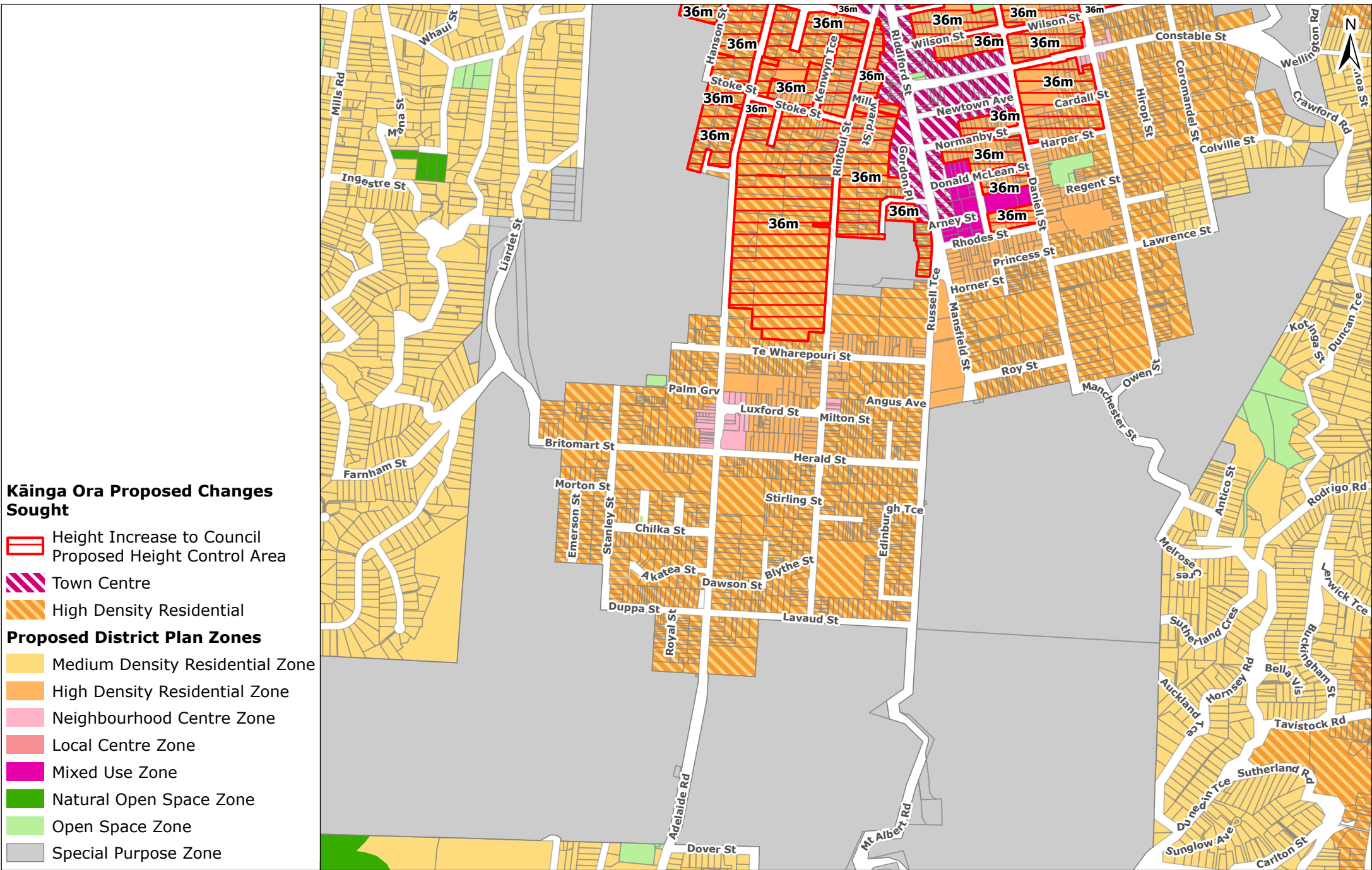


Centre: Newtown (North)
 Proposed Classification: Local Centre
 Submission Classification: Town Centre




PREPARED BY	TPG REF. 718448
Conor McIntosh	SHEET 18 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres









Imagery sourced from: LINZ Data Services
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).



Kāinga Ora Proposed Changes Sought

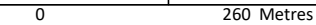
-  Height Increase to Council Proposed Height Control Area
-  Town Centre
-  High Density Residential

Proposed District Plan Zones

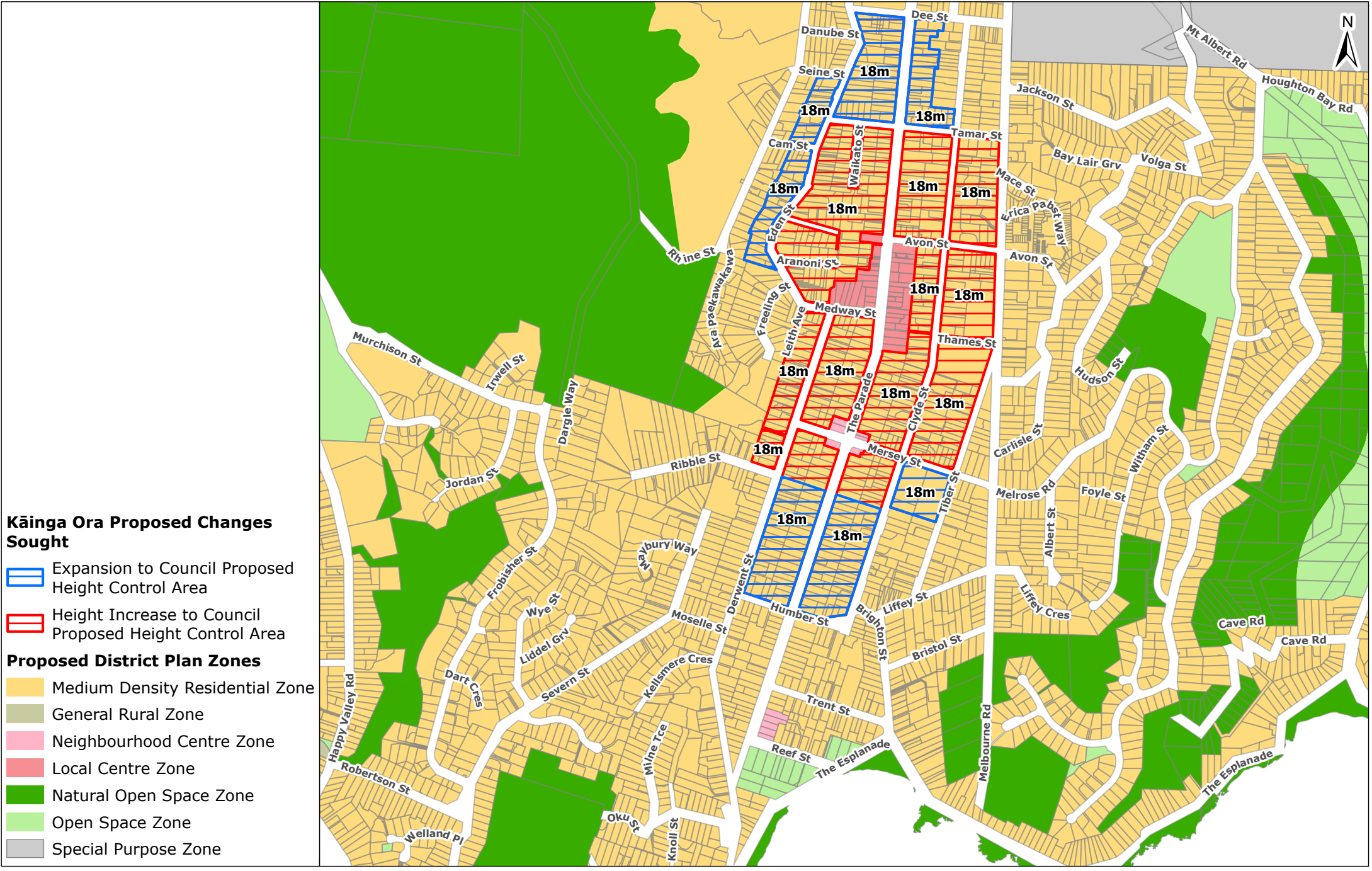
-  Medium Density Residential Zone
-  High Density Residential Zone
-  Neighbourhood Centre Zone
-  Local Centre Zone
-  Mixed Use Zone
-  Natural Open Space Zone
-  Open Space Zone
-  Special Purpose Zone

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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Newtown (South)
 Proposed Classification: Local Centre
 Submission Classification: Town Centre

PREPARED BY	TPG REF. 718448
Conor McIntosh	SHEET 19 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
	





Kāinga Ora Proposed Changes Sought

- Expansion to Council Proposed Height Control Area
- Height Increase to Council Proposed Height Control Area

Proposed District Plan Zones

- Medium Density Residential Zone
- General Rural Zone
- Neighbourhood Centre Zone
- Local Centre Zone
- Natural Open Space Zone
- Open Space Zone
- Special Purpose Zone

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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).




Centre: Island Bay
 Proposed Classification: Local Centre
 Submission Classification: Local Centre

PREPARED BY	TPG REF. 718448
Conor McIntosh	SHEET 20 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres



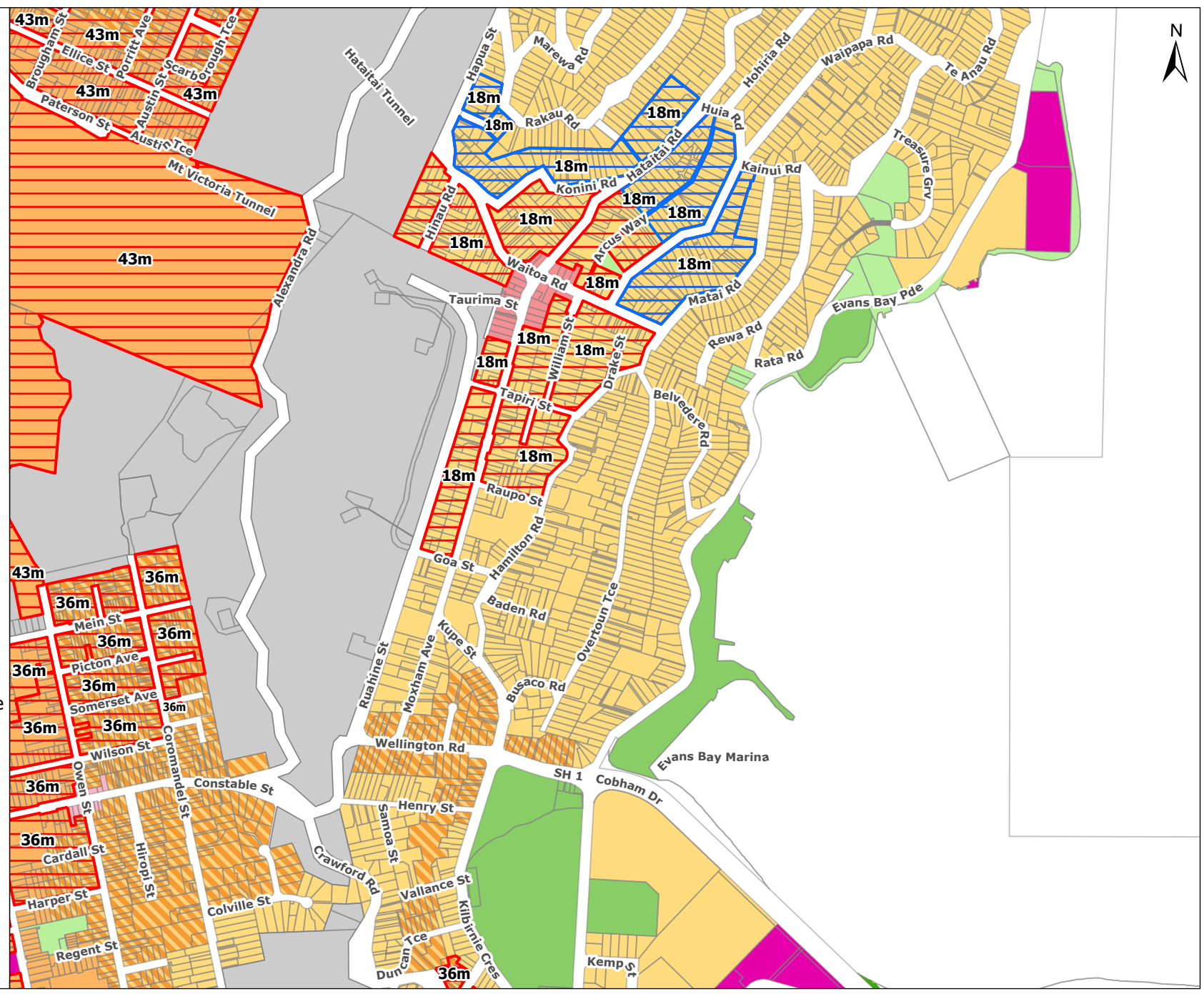


Kāinga Ora Proposed Changes Sought

-  Expansion to Council Proposed Height Control Area
-  Height Increase to Council Proposed Height Control Area
-  High Density Residential

Proposed District Plan Zones

-  Medium Density Residential Zone
-  High Density Residential Zone
-  Neighbourhood Centre Zone
-  Local Centre Zone
-  Mixed Use Zone
-  Natural Open Space Zone
-  Open Space Zone
-  Sport and Active Recreation Zone
-  Special Purpose Zone

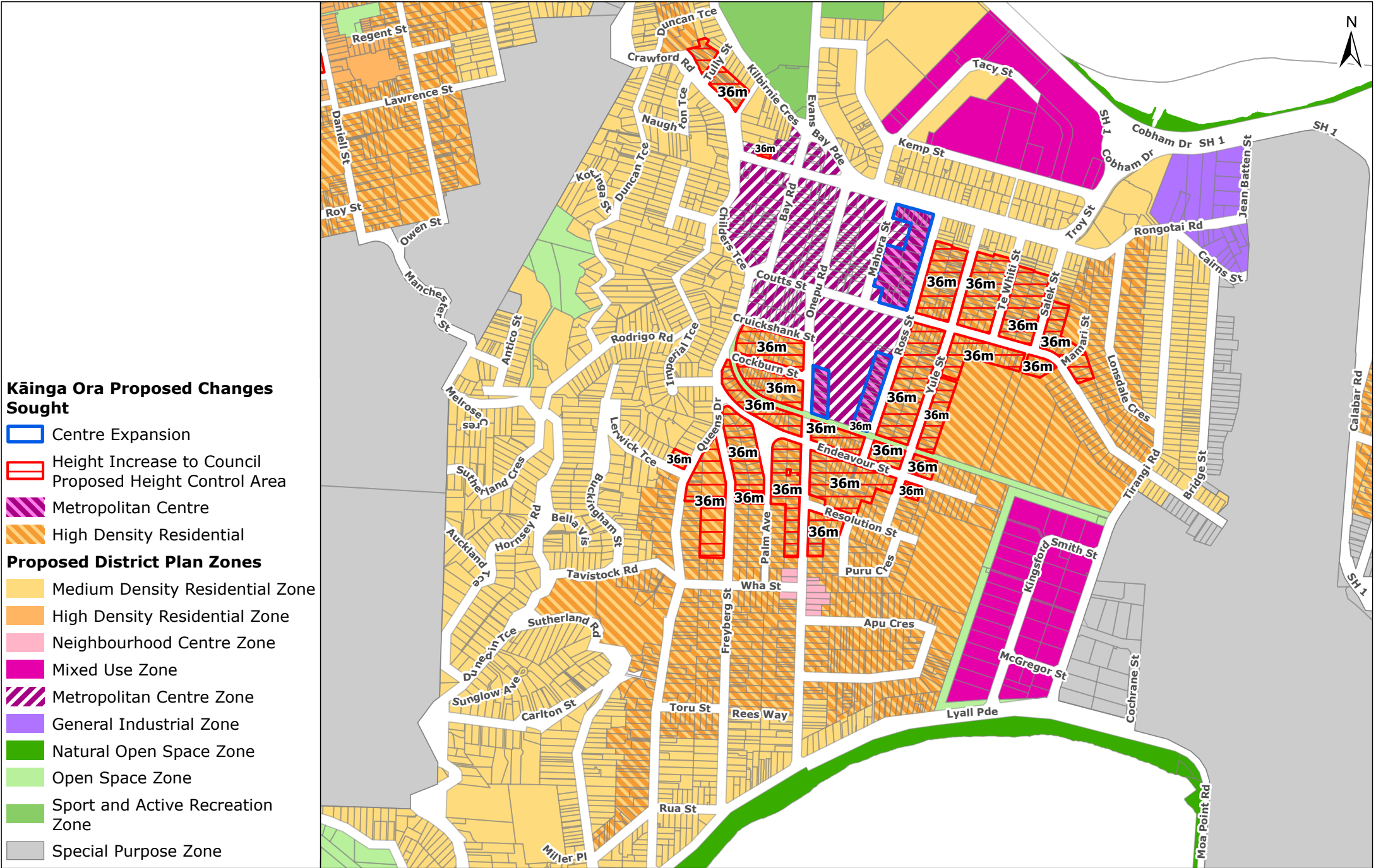


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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Hataitai
 Proposed Classification: Local Centre
 Submission Classification: Local Centre

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Conor McIntosh	SHEET 21 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0 260 Metres	





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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Kilbirnie
 Proposed Classification: Metropolitan Centre
 Submission Classification: Metropolitan Centre

PREPARED BY	TPG REF. 718448
Conor McIntosh	SHEET 22 OF 24
DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres



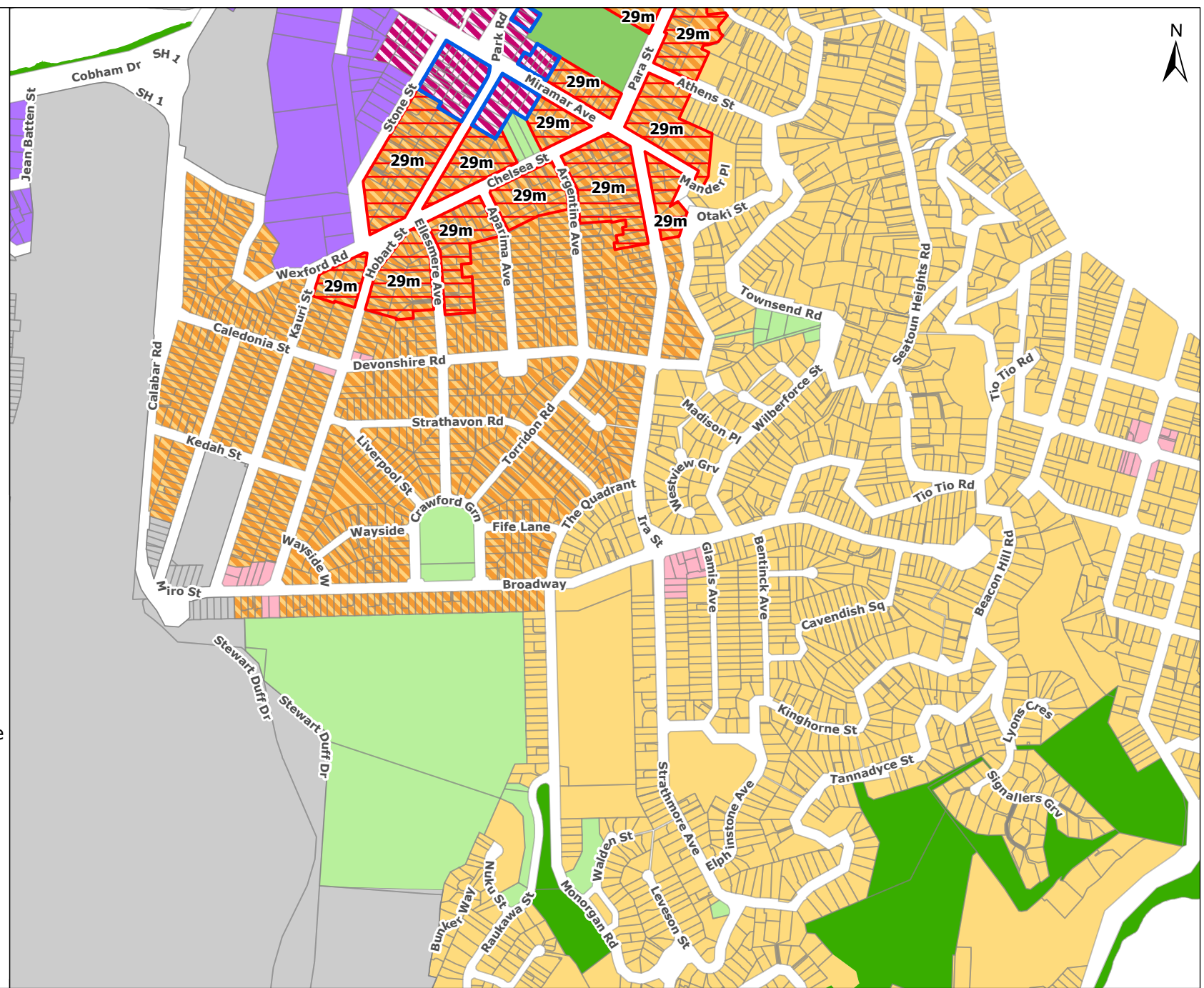


Kāinga Ora Proposed Changes Sought

- Centre Expansion
- Height Increase to Council Proposed Height Control Area
- Town Centre
- High Density Residential

Proposed District Plan Zones

- Medium Density Residential Zone
- Neighbourhood Centre Zone
- Local Centre Zone
- General Industrial Zone
- Natural Open Space Zone
- Open Space Zone
- Sport and Active Recreation Zone
- Special Purpose Zone







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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Mirimar (South)
 Proposed Classification: Local Centre
 Submission Classification: Town Centre

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17/03/2023	23 OF 24
A4 Scale 1:10,000	
0 260 Metres	

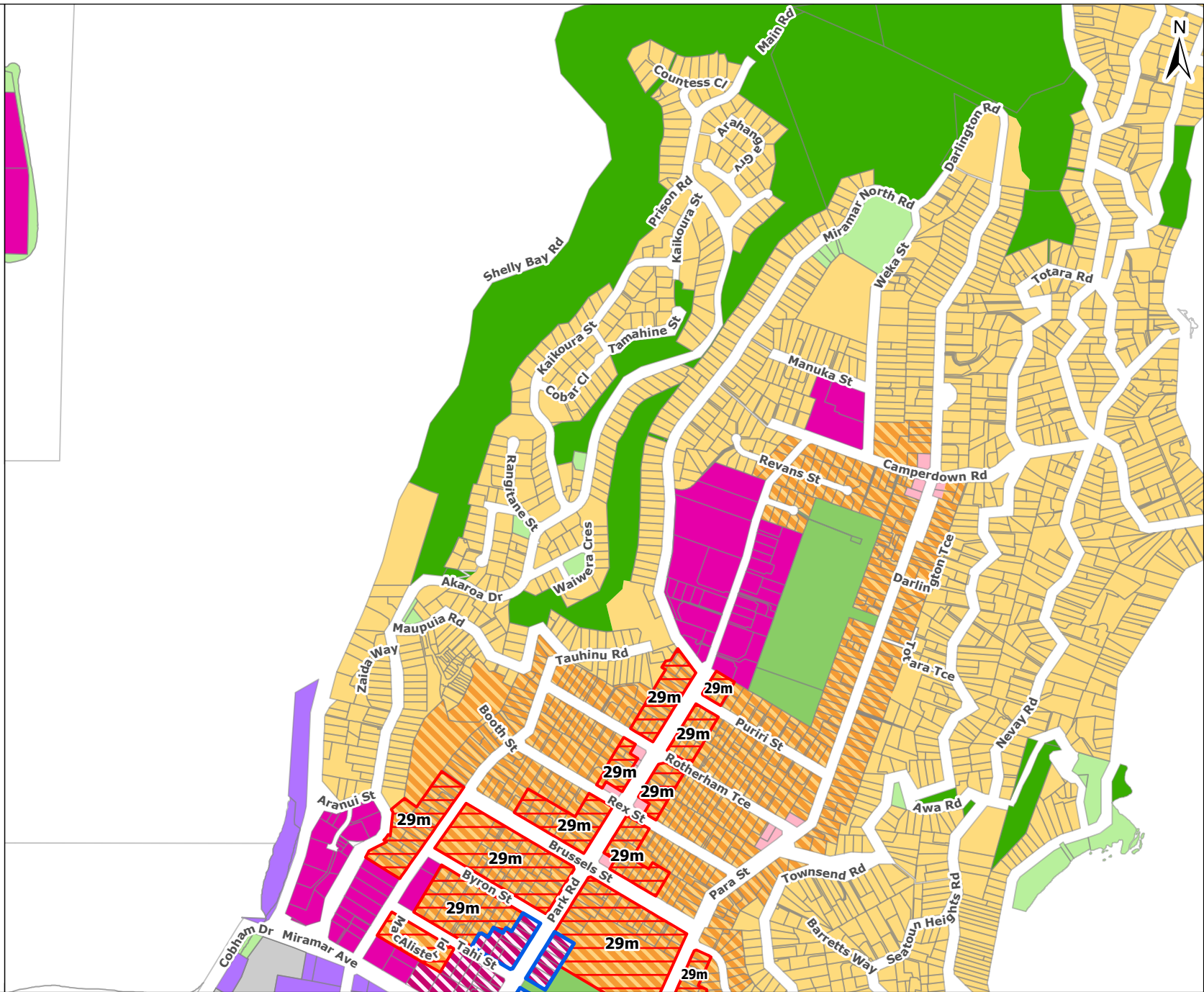


Kāinga Ora Proposed Changes Sought

-  Centre Expansion
-  Height Increase to Council Proposed Height Control Area
-  Town Centre
-  High Density Residential

Proposed District Plan Zones

-  Medium Density Residential Zone
-  Neighbourhood Centre Zone
-  Local Centre Zone
-  Mixed Use Zone
-  General Industrial Zone
-  Natural Open Space Zone
-  Open Space Zone
-  Sport and Active Recreation Zone
-  Special Purpose Zone



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Centre: Mirimar (North)
 Proposed Classification: Local Centre
 Submission Classification: Town Centre + Mixed Use

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DATE 17/03/2023	A4 Scale 1:10,000
0	260 Metres

