BEFORE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan

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STATEMENT OF PRIMARY EVIDENCE OF WILLIAM HEMMING FIELD ON BEHALF OF CHRISTCHURCH CITY COUNCIL

URBAN DESIGN:
CITY SPINE TRANSPORT CORRIDOR
TRANSPORT CHAPTER
SPECIFIC PURPOSE (HOSPITAL) ZONE

Dated: 11 August 2023

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EXECUTIVE SUMMARY

1. My full name is **William Hemming Field**. I am employed as a Senior Urban Designer at the Christchurch City Council.

2. I have prepared this statement of evidence on behalf of the Christchurch City Council (**Council**) in respect of the following matters raised in submissions on Plan Change 14 to the Christchurch District Plan (the **District Plan**; **PC14**):

    (a) **Part 1 - Chapter 6.1A Qualifying matters - City Spine Transport Corridor:**

        (i) the potential for reduced development capacity as a result of the proposed setbacks;

        (ii) an alleged lack of a strong evidence base for the scale of the proposed setbacks; and

        (iii) delivery of good urban design of 'main street' retail environments.

    (b) **Part 2 - Chapter 7 Transport:**

        (i) parts of the proposed Transport Chapter that some submitters consider to be onerous, relating to consideration of emergency services access; and

        (ii) an amendment sought to 7.4.4.3. a.v. – Minimum number of cycle parking facilities.

    (c) **Part 3 – Chapter 13.5 Specific Purpose (Hospital) Zones (SPHZ):**

        (i) retention of operative recession planes for the former Christchurch Women's Hospital site;

        (ii) the request for site-specific shading analysis for the former Christchurch Women's Hospital site;

        (iii) a potential reduced maximum building height of 20m for the former Christchurch Women's Hospital site; and

        (iv) removing reference to the former Christchurch Women's Hospital from Policy 13.5.2.1.3 requiring comprehensive residential development if no longer required for hospital use.

3. I summarise below my views, as an urban design expert, on these issues raised by submitters.

Part 1 - Chapter 6.1A City Spine Transport Corridor - Key Points

4. This qualifying matter (**QM**) proposes setbacks along the City Spine Transport Corridor to provide for edge tree planting and environmental amenity where transport uses makes it difficult to include street trees along the City Spine as it passes through Residential Zones, and for greater potential for more useable commercial street environments (including tree planting) along the City Spine in Commercial Zones.

5. In relation to potential loss of development capacity in Commercial Zones along the corridor due to these setbacks, I consider that from Church Corner to the intersection of Cranford Street and Main North Road is the area that is mainly affected by potential losses of capacity. A large section of Manchester Street within this area is not affected due its width being greater than 24m.

6. The extent of any loss in development capacity depends on lot shapes, location (extent of frontage i.e. corner sites), and sizes, maximum ground floor living area (**GFLA**) constraints, proposed heights in different zones, residential use at ground level frontages, and development considerations such as car parking, services or outdoor dining.

7. In the Medium and High-density Residential Zones along the corridor, there are 50% net site coverage rules (14.5.2.4/14.6.2.1.2), and 20% landscaped area and tree canopy cover rules (14.5.2.2/14.6.2.7). I consider that many sites would be able to partly absorb these within the 4m frontage setback area. This is illustrated in **Figures 1 and 2** below.

8. I acknowledge that recession planes may limit some upper-level offset development capacity, depending on the widths of sites. A reduced degree of design flexibility may also occur.

9. I have provided further information explaining the anticipated need for the proposed setbacks in Commercial Zones. In summary, this includes safety for people in these areas with all levels of mobility (including the elderly and disabled persons), accommodating public transport, car and cycle traffic design, capacity for pedestrian routes, building activation, street tree planting, accommodating street furniture, stormwater management, infrastructure,

universal access and crime prevention through environmental design (**CPTED**) outcomes.

10. Based on Waka Kotahi guidelines[1] for minimum dimensions, I have tested with cross-sections the ability to achieve the above outcomes in a 20m wide commercial 'Main' street and Residential Zoned streets. In my opinion, the additional proposed 1.5m and 4m setbacks would assist with creating better functioning streets.

11. **Figures 9 and 10** illustrate the benefits of providing tree planting along the City Spine in Residential Zones for enhancing the amenity of the corridor. I consider a rule requiring that tree planting within the setback frontage area should also be required.

12. I consider the 'Key pedestrian frontages' rule in the operative District Plan anticipates commercial frontage modulation to a greater extent than the 1.5m setback proposed through PC14. A 1.5m setback would, in my opinion, still provide for a degree of commercial street cohesion, avoid creating narrow or deeply recessed entrapment areas (which create a CPTED issue), retain the potential for providing active edges and, over time, provide for edge cohesion. I consider that the long-term benefits of achieving a wider corridor would create a more well-functioning commercial street (in line with Policy 1(c) of the National Policy Statement on Urban Development 2020 (**NPS-UD**)).

Part 2 - Chapter 7 Transport - Key Points

13. I support the inclusion of *7.4.3.7b - Access design requiring a minimum pedestrian access*, which allows for pedestrian access with a width of 3m for residential developments, with a formed pathway of at least 1.5m, for the following reasons: it improves safety and security of pedestrians and occupants (in line with CPTED principles) by providing for passing space and visibility, privacy separation from paths to windows, space for all users, landscaping, and for cycle and bin access. I consider that this 3m minimum width is not an onerous requirement for developers.

14. However, I do not support requiring the unobstructed formed width of pedestrian accessways to be 3m, as requested by Fire and Emergency New

[1] (Footpath width | Waka Kotahi NZ Transport Agency (nzta.govt.nz)

Zealand (**FENZ**). I consider these areas could be vulnerable to car parking, bin storage, and impact on landscaping space.

15. I consider that *"straight, clear, unobstructed and well-lit"* pedestrian accessways (as sought by FENZ) could be required that exclude obstructions but still have provision for low planting.

16. FENZ requests other increases in legal driveway widths which I consider would help to accommodate planting strips on either side of formed accessways.

17. FENZ also requests a 6.2m width on curved or cornered accessways. I have concern that this may create excessively wide areas where unplanned car parking and bin storage may occur.

18. In relation to the inclusion of 'Table 7.5.3.1 – Minimum numbers of loading spaces required', I support related proposed amendment *14.5.2.15 Garaging, loading spaces and carport building location,* requiring loading space on a front site to be located 1.2m behind the front façade in the medium density residential zones (**MRZ**), and behind the rear façade of a residential unit in high density residential zones (**HRZ**). This would avoid loading spaces adversely affecting good street relationships and amenity.

19. In relation to Rule 7.4.3.13 - Co-location of Vehicle Crossings, I consider that, where possible, the co-location of vehicle crossings along residential streets improves safety and amenity of streets by minimising potential conflicts between pedestrians, cycles, and other vehicles, and creates better street frontages with buildings and gardens. It also can provide for more on-street parking and street trees. On this basis, I support this proposed rule.

20. Finally, in relation to 7.4.4.3 a.v - Minimum number of cycle parking facilities, I consider that this matter could adopt the terminology of 14.15.1c.i. (Residential design principles), and replace the term *"efficient"* with *"logical and coherent site layout"* to avoid a prioritised interpretation of the matter.

Part 3 - Chapter 13.5 Specific Purpose (Hospital) Zones - Key Points

21. The approach taken has been to broadly align the urban form of SPHZs with HRZ areas where they adjoin.

22. I have some concern that the lack of a site coverage rule for SPHZs could allow for larger buildings to be constructed adjacent to HRZ areas. I consider

that this risk of building dominance and potentially overshadowing is manageable with the following rules (refer to diagrammatic cross-sections in **Appendix B**):

(a) Maximum permitted building height of 22m;

(b) 10m internal boundary building setback (13.5.4.2.3b), and 4m internal boundary building setbacks (13.5.4.2.4.a.);

(c) Recession planes commensurate with HRZ (13.5.4.2.4.d. i.);

(d) Max. 30m building length rule (RD13ii A. B.);

(e) 1000m^2 GFA (gross ground floor area) trigger (RD10a.);

(f) A minimum of tree planting requirement (13.5.4.2.4.e.i.b.);

(g) 60% max. site coverage for former Christchurch Women's Hospital; and

(h) Matters of discretion (13.5.5).

23. In my opinion, this package of rules, and triggers for restricted discretionary consent assessments, would manage the issues raised in the submissions.

24. I support a comprehensive residential development approach for the former Christchurch Women's Hospital site, if not used for hospital purposes, to help to create a well-functioning residential development outcome.

INTRODUCTION

25. I am a Senior Urban Designer at the Christchurch City Council. I have been a Senior Urban Designer for the past 2 years at the Christchurch City Council. Prior to this role, I was a Senior Landscape Architect at Regenerate Christchurch for a period of 2 years, and a Principal Landscape Architect at a New Zealand based multi- disciplinary environmental consultancy for a period of twenty years.

26. From 2009-2012, I was a member of the Christchurch Urban Design Panel, providing independent urban design review of private and public sector developments.

QUALIFICATIONS AND EXPERIENCE

27. I hold the qualifications of Bachelor of Landscape Architecture (1st Class Honours) from Lincoln University, and Bachelor of Fine Arts (University of Canterbury School of Fine Arts). I have received accredited training in and have undertaken CPTED assessments (ISMCPI Advanced training).

28. My current role involves providing urban design advice for resource consent applications and Council projects. My experience includes providing policy advice, spatial and land use structure and outline development planning, plan change assessments of residential developments and industrial rezoning, resource consent preparation and assessment for residential and commercial developments and subdivisions, and infrastructure projects. I also have design experience in urban and rural amenity, historic and natural settings, and ecologically sensitive design projects, and project design development and construction. As part of the above experience, I have contributed to mana whenua cultural design integration and co-design for projects.

29. I have previously provided expert advice to the Environment Court, the Christchurch Independent Hearings Panel, and at Council hearings.

30. I am a registered member of the New Zealand Institute of Landscape Architects, and member of the New Zealand Urban Design Forum.

31. Previously, I prepared sketch cross-sections testing the proposed setback distances for the proposed City Spine Transport Corridor to assist with the preparation of the Section 32 'Appendix 45 - QM - City Spine Transport Corridor Background Information' for the notified PC14. Except where I say otherwise in this evidence, I agree with the content and the analysis of this previous involvement and the Section 32 report.

32. I rely on, and refer back to, this report but do not intend to repeat their content in order to minimise duplication. The above reports, and all section 32 reports and associated appendices for PC14 can be accessed from the Council's website[2].

CODE OF CONDUCT

33. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it.

[2] https://ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/plans/christchurch-district-plan/changes-to-the-district-plan/proposed-changes-to-the-district-plan/pc14/

Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

SCOPE OF EVIDENCE

34. My statement of evidence addresses the following matters:

(a) Chapter 6.1A Qualifying matters - City Spine Transport Corridor

(i) Chapter 15 – Commercial, 15.4.2.10, 15.5.2.10, 15.6.2.11, 15.8.2.13, 15.10.2.10, 15.12.2.13 Setback from corridor, and 15.14.5.3 Matters of Discretion; and

(ii) Chapter 14 – Residential, 14.6.2.17 Minimum road boundary setback, 14.5.2.18 Minimum road boundary setback - and 14.15.1.j Matters of Discretion.

(b) **Chapter 7 Transport** in relation to:

(i) Rule 7.4.3.7b - Access design;

(ii) Rule 7.5.7.h - Access design and gradient, including Table 7.5.7.1 – Minimum requirements for private ways and vehicle access;

(iii) Rule 7.5.3.1 (Table) - Minimum numbers of loading spaces required;

(iv) Rule 7.4.3.13 - Co-location of Vehicle Crossings; and

(v) Rule 7.4.4.3 a.v - Minimum number of cycle parking facilities required.

(c) **Chapter 13.5 Specific Purpose (Hospital) Zones** adjoining proposed HRZ.

35. In preparing this evidence, I have reviewed the following relevant documents:

(a) Proposed provisions for PC14;

(b) Proposed planning maps for PC14 showing new land zonings and qualifying matter areas;

(c) Section 32 reports in support of PC14 as originally notified; and

(d) Relevant submission points by:

(i) #842 - Fire and Emergency New Zealand;

(ii) #823 - The Catholic Diocese of Christchurch;

(iii) #814 - Carter Group Limited;

(iv) #170 - John Lieswyn;

(v) #805 - Waka Kotahi NZ Transport Agency (**Waka Kotahi**);

(vi) #877 - Ōtautahi Community Housing Trust;

(vii) #834 - Kāinga Ora – Homes and Communities;

(viii) # 61 Victoria Neighbourhood Association (**VNA**); and

(ix) #918 G. Banks.

36. I am authorised to provide this evidence on behalf of the Council.

PART 1 - CHAPTER 6.1A QUALIFYING MATTERS - CITY SPINE TRANSPORT CORRIDOR

Introduction

37. Under the notified version of PC14, road frontage building setbacks are proposed for some Commercial and all Residential Zones along the City Spine Transport Corridor. This relates to the following provisions: 15.4.2.10, 15.5.2.10, 15.6.2.11, 15.8.2.13, 15.10.2.10, 15.12.2.13 Setback from corridor, and 15.14.5.3 Matters of Discretion.

38. The purpose of these proposed setbacks is to provide for landscape amenity edges (including trees) along residential sections. In commercial sections of the corridor, the setback would provide for increased potential for useable public realm street width and building interfaces, and potentially tree planting and space for canopy spread.

39. I am aware that the Greater Christchurch Partnership has investigated street layout options as part of an indicative business case for Mass Rapid Transit (**MRT**) along the corridor, led by the submitter, Waka Kotahi. The future outcome of this is uncertain at this stage, and I consider that the proposed setbacks would be beneficial if MRT occurred in the future. The proposed setbacks would help to address the spatial constraints of the corridor by

potentially increasing pedestrian accessibility, useability, and amenity of commercial streets, and by providing for residential amenity through edge landscape treatment and tree planting along the corridor.

40. Even if MRT does not occur in the future, I consider that the proposed setbacks would still be beneficial in the long-term for the above reasons.

41. The proposed City Spine Transport Corridor runs as follows:

    (a) Beginning at the Halswell Junction Road intersection with Main South Road at the southern end;

    (b) Along Main South Road to Riccarton Road;

    (c) Riccarton Road onto Riccarton Avenue (through Hagley Park);

    (d) Riccarton Road to Tuam Street;

    (e) Tuam Street to Manchester Street;

    (f) Manchester Street to Kilmore Street;

    (g) Kilmore to Victoria Street and Papanui Road;

    (h) Papanui Road to Main North Road; and

    (i) Ending at the intersection of Dickeys Road and Main North Road at the northern end.

42. This proposed route is illustrated in the Section 32 report[3] and, as I understand it, was determined through the preparation of 'The Canterbury Regional Land Transport Plan'.[4]

43. In Commercial Zones, the associated qualifying matter provided in PC14 applies to all properties with road boundaries fronting the City Spine Transport Corridor in the following Commercial Zones - Town Centre Zones, Local Centre Zones, Neighbourhood Centre Zones, Large Format Retail Zone, Mixed-use Zone, and Central City Mixed-use Zone. The rule and matters of discretion are outlined in **Appendix A.**

44. In Residential Zones, this qualifying matter - 14.5.2.18 and 14.6.2.17, *Minimum road boundary setback* applies to all properties fronting the City Spine Transport Corridor in the Medium Density Residential Zones and High-

[3] PC14-QM-Scope-for-Future-Proofing-Transport-Corridors-draft-22_12_22.pdf (ccc.govt.nz)
[4] https://www.ecan.govt.nz/your-region/plans-strategies-and-bylaws/canterbury-transport-plans/

Density Residential Zones. The rule and matters of discretion are outlined in **Appendix A.**

Responses to submissions – introduction

45. The following submissions have opposed these setbacks being included in PC14.

Submission #805 - Waka Kotahi

46. Waka Kotahi consider that this qualifying matter reduces the potential for development capacity along the City Spine Transport Corridor.

Submission #877 - Ōtautahi Community Housing Trust, and Submission #834 - Kāinga Ora – Homes and Communities

47. Ōtautahi Community Housing Trust (**OCHT**) and Kāinga Ora consider that, in Commercial Zones, there is a direct conflict in urban design outcomes (and rules) where the Key Pedestrian Frontage rules require buildings to be built up to the road boundary to deliver good urban design outcomes and facilitate a continuous street edge (often with veranda cover for pedestrians). The proposed spine corridor QM is therefore contrary to the delivery of good quality 'main street' retail environments.

48. Those submitters generally challenge the rationale for this QM, so below I summarise key aspects from an urban design perspective, relevant to both the setback provided in Commercial Areas and that in Residential Areas.

49. I address these issues in turn below.

Development capacity

50. In response to the concern expressed by Waka Kotahi regarding an impact on development capacity, I note that this differs depending on the zones through which the city spine corridor passes.

51. The following zones (or parts thereof) are not affected by this QM due to other setback provisions in PC14:

    (a) In the **Large Format Retail Zone**, rule 15.8 provides for 1.5m to 12m setbacks. Even at their smallest, these are consistent with the proposed City Spine Transport Corridor 1.5m minimum setback. I therefore consider that this zone would not be affected.

(b) In the **Mixed-use Zone**, under rule 15.10, ground-floor residential use is required to be set back 3m.

(c) In the **Central City Mixed-use Zone**, under rule 15.12, again ground-floor residential use is required to be set back 3m.

(d) In **Industrial General Zone**, rule 16.4 provides that any activity fronting onto an arterial road is required to be set back 3m.

52. That said, I acknowledge that development capacity in some sections of the corridor could be affected by the QM, which applies where the road corridor widths are less than 24m. In this regard:

(a) Most of Main South Road is not affected (except for small intermittent sections of 20m widths).

(b) From Cranford Street northwards, Main North Road is not affected.

(c) Sections of Manchester Street are affected, but a large portion from Lichfield to Armagh Street in the City Centre is not affected.

(d) The lengths of Riccarton Road and Tuam Street are mostly affected.

(e) Kilmore and Victoria Streets, and Papanui and Main North Roads to Cranford Street are affected.

53. I also consider that the QM's proposed 1.5m commercial setback would potentially affect the following **Commercial Zones** on Riccarton Road, Tuam, Kilmore and Victoria Streets, and Papanui and Main North Road to Cranford Street:

(a) Town Centre Zones (rule 15.4);

(b) Local Centre Zones (rule 15.5);

(c) Neighbourhood Centre Zone (rule 15.6);

(d) Mixed-use Zone (rule 15.10);

(e) City Centre Zone (rule 15.11); and

(f) Central City Mixed Use Zone (rule 15.12).

54. The Styx, Papanui, Riccarton and Hornby commercial areas are within the **Town Centre Zones**. I consider that the proposed setback would potentially slightly reduce the development capacity of each lot area depending on the

lengths of various frontage widths and the anticipated height limits in this zone. It is noted that for this zone, a maximum 4,000m² GLFA is permitted (15.4.2.1.a.i – PC14). While these leasable floor areas may not necessarily be located on the ground floors, it is likely that they are for commercial profile reasons. Most lots in this zone are less than 4,000m^2 in size, making the entire ground floor area commercially leasable. For larger lots over 4000m^2 there may be less impact on the development capacity.

55. Along the corridor the Bush Inn/Church Corner, Carlton Corner, and Merivale commercial areas are in the **Local Centre Zones**. These areas have a mix of lot sizes ranging from fine grain retail (119m^2) to large format 11,889m^2 (eg the Church Corner Supermarket site). When redeveloped over time, many of the lots in this zone are large enough to accommodate a maximum GFLA area of 1000m^2 (15.4.2.1.a.ii – PC14) and the proposed setback. Lots that are less than 1000m^2 in size would have a slightly reduced commercial development capacity, depending on their frontage width dimensions.

56. I note that in this zone many buildings are already set back further than 1.5m from the street frontage, and many of the smaller lots are elongated rectangular shapes extending from the street boundary, making the impact of the setback less due to the narrow frontages.

57. The development areas within the **Neighbourhood Centre Zone** have no setback, or maximum GFLA, or site coverage rules applying. These zone areas are smaller-scaled and often located at intersections or corners servicing nearby residential areas. They are predominantly small-scaled lots that are either built to the street or with car parking on the lot frontage area. Car parking to the rear is also a common aspect. Based on reviewing aerial photographs and cadastral plans of the route, I consider that some of these sites already have a setback for car parking. Many of these sites could capitalise on the increased setback for outdoor hospitality potential and absorb the loss of building frontage in other parts of the sites. Despite this, I consider that some sites would have a slightly reduced development capacity if redeveloped due to the proposed setback.

58. All the Commercial Zones anticipate that residential (mixed use) development could occur above ground floor commercial use. The 1.5m setback would, to varying extents, impact on the residential development capacity above ground level depending on the height limits of each zone. In my opinion, within the setback area above street level, residential balconies

could be accommodated. These would need to be considered in relation to street tree canopies but could be addressed through matters of discretion.

59. In the Central City Mixed-use Zone and Central City Mixed-use Zone (South Frame) the minimum building setback from a road boundary where residential activity is located on the ground floor facing the street is 3m, and where buildings do not extend to the road boundary of a site, a minimum 3m-wide landscaping strip shall be provided along the full frontage of the site that is not built up to (PC14 provisions). This residential setback could incorporate the proposed City Spine Transport Corridor 1.5m setback. If developers preferred to locate a building at the road boundary, then a reduced development capacity at the frontage would occur. This would be to a height of 17m (13.2.1 Building height) of the building base for the width of the site in this zone.

60. In the City Centre Zone, there is no setback, or maximum GFLA, or site coverage rules applying. The 1.5m setback would reduce the developable area of lots adjoining the corridor by the width of the lot at the street frontage. This would apply to the area of the building under the street wall height limits of 21m (or 28m on corner sites).

61. Overall, I consider that there would be some loss of development capacity along the corridor in Commercial Zones. The extent of this varies from site to site depending on the site shape, extent of street boundary interface, other planning provisions, and the street frontage building heights.

62. The Waka Kotahi submission also raises a concern that the setbacks would affect the development capacity along the corridor in **Residential Zones**. In the HRZ and MRZ the proposed road boundary 4m setback would be an increase of 2.5m to the 1.5m setback proposed for these zones elsewhere. The purpose of this additional frontage space along the corridor is to provide for space for edge tree planting and amenity along the corridor where space for transport purposes makes it difficult to include street tree planting.

63. In those areas, however, the proposed 4m setback would require residential buildings to be located 2.5m (plus existing 1.5m setback) further into the lots. This would transfer some of the 50% net site coverage requirement (rules 14.5.2.4/14.6.2.1.2), and the 20% landscaped area and tree canopy cover (rules 14.5.2.2/14.6.2.7) to the street front.

64. This approach is illustrated in **Figures 1 and 2** below which show a building that complies with the site coverage, internal boundary setbacks, and heights and recession planes being positioned at different setbacks while retaining the same building scale and form.

Figure 1 – Shows and indicative complying apartment building footprint (based on modelled building envelope) with landscaping and tree canopy requirements – **with a 1.5m setback**

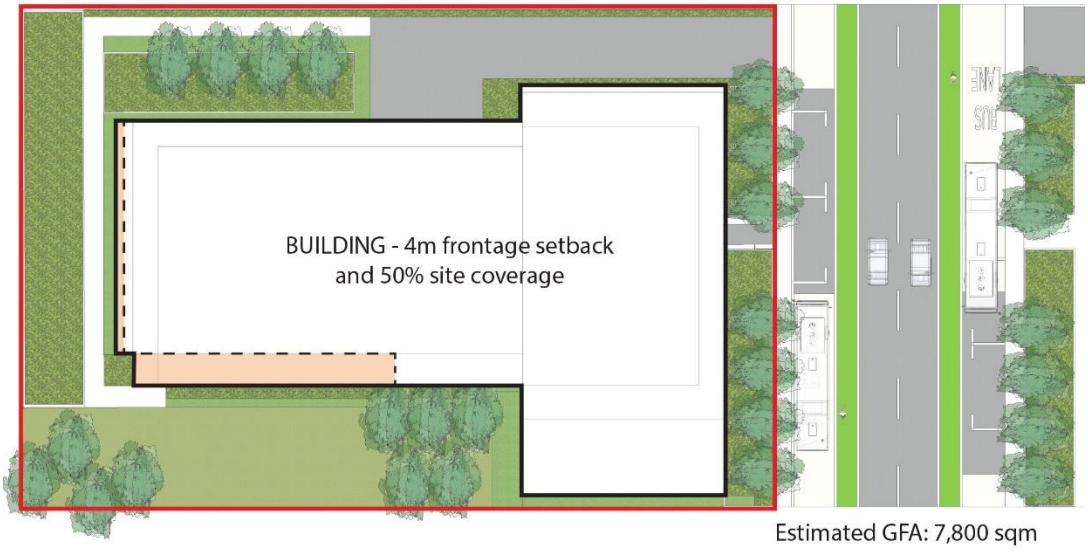


Figure 2 - Shows and indicative complying apartment building footprint (based on modelled building envelope) with landscaping and tree canopy requirements – **with a 4m setback**

65. In this example on a 2400m^2 site (40m x 60m site), the development capacity would be very similar with both setbacks. **Figure 2** shows that the development capacity from the front of the site can mostly be redistributed to the rear side area shown in orange on the plan.

66. The 4m setback plan has 50m2 less development area. This is due to recession planes on the upper level restricting some development capacity. As sites get narrower, this reduced capacity increases due to recession planes. Conversely, the setback does not affect the development capacity if the site is wider. It is likely that any reduced development capacity in MRZ would be less that HRZ due to the lower height limits in relation to recession planes for this zone. This would be dependent to some extent on the width of proposed development sites.

67. In my opinion, the actual area for residential building development would not necessarily change to a large extent as a result of this QM. This would be dependent on the size and shape of lots, and the demands of developers.

68. The model used above did not consider the internal layout of the indicative apartment configuration. I consider that a degree of reduced design flexibility for configuring internal layouts, ground level elements such as bin storage, cycle and car parking could occur on some sites. Through careful design and planning, however, I consider this could likely be managed in most situations.

69. I note that developers would have the option of an increased net site coverage of 60% for developments that do not include carparking. With convenient public transport choice along City Transport Spine Corridor, I consider that this would be an option for developers. Furthermore, since the notified version of PC14, I understand that the permissible heights of residential buildings in HRZ is now proposed to increase to 22m, from 20m, allowing for increased development capacity with 7 storeys.

70. As such, while this QM may bring about some reduced design flexibility for developments, I consider that the benefit to developers of an attractive tree-lined transport corridor would provide a degree of added value to residential development sites, such that the concerns expressed by Waka Kotahi are largely unfounded.

Commercial Zone 1.5m Proposed Setback

71. In respect of the submissions of **Ōtautahi Community Housing Trust (OCHT) and Kāinga Ora**, I agree that the City Spine Transport Corridor should ideally allow for sufficient space to achieve well-integrated multiple land and transport uses, and infrastructure outcomes. I consider that if adequate street width is provided then conflicts between users can be managed, infrastructure can be accommodated, and well-functioning and

pleasant public and private realm interfaces are more likely to occur or be created overtime through streetscape enhancements and building developments. To my mind this is what the QM provides.

72. This includes consideration of whether best-practice streetscape and infrastructure design can be achieved. In my opinion, this includes providing adequate space for:

(a) safe, efficient, and comfortable multimodal street design for all mobility users including people with disabilities, seniors, and children;

(b) public transport routes and services such as stops and sufficient waiting areas, vehicle swing areas and clearances;

(c) at least two traffic lanes and the associated traffic design geometries and safety requirements;

(d) adequate capacity space for safe pedestrian routes and crossings;

(e) building edge activation through hospitality areas and retail entrances;

(f) safe cycle lanes and convenient facilities;

(g) appropriately scaled street trees, and planting (in line with principles of 'Streets as Ecosystems');

(h) streetscape elements such as street furniture (seats, bins, and bollards);

(i) stormwater retention and treatment facilities;

(j) space for below and above ground infrastructure;

(k) signage and lighting poles;

(l) good commercial (and residential) street relationships and servicing; and

(m) good universal access and CPTED outcomes.

73. In the 'Aotearoa urban street planning and design guide'[5], the One Network Street[6] categories provide dimensions and indicative cross sections of 'Urban Connectors' and 'Main' streets. These are indicative streets that I consider

[5] Aotearoa urban street planning and design guide - All updates | Waka Kotahi NZ Transport Agency (nzta.govt.nz)
[6] One Network Framework | Waka Kotahi NZ Transport Agency (nzta.govt.nz)

are likely to represent the City Spine Transport Corridor road widths of approximately 20m.

74. The illustration below - **Figure 3**, from this document, indicatively shows the spatial allocation of anticipated activities and uses in a 'main' street.

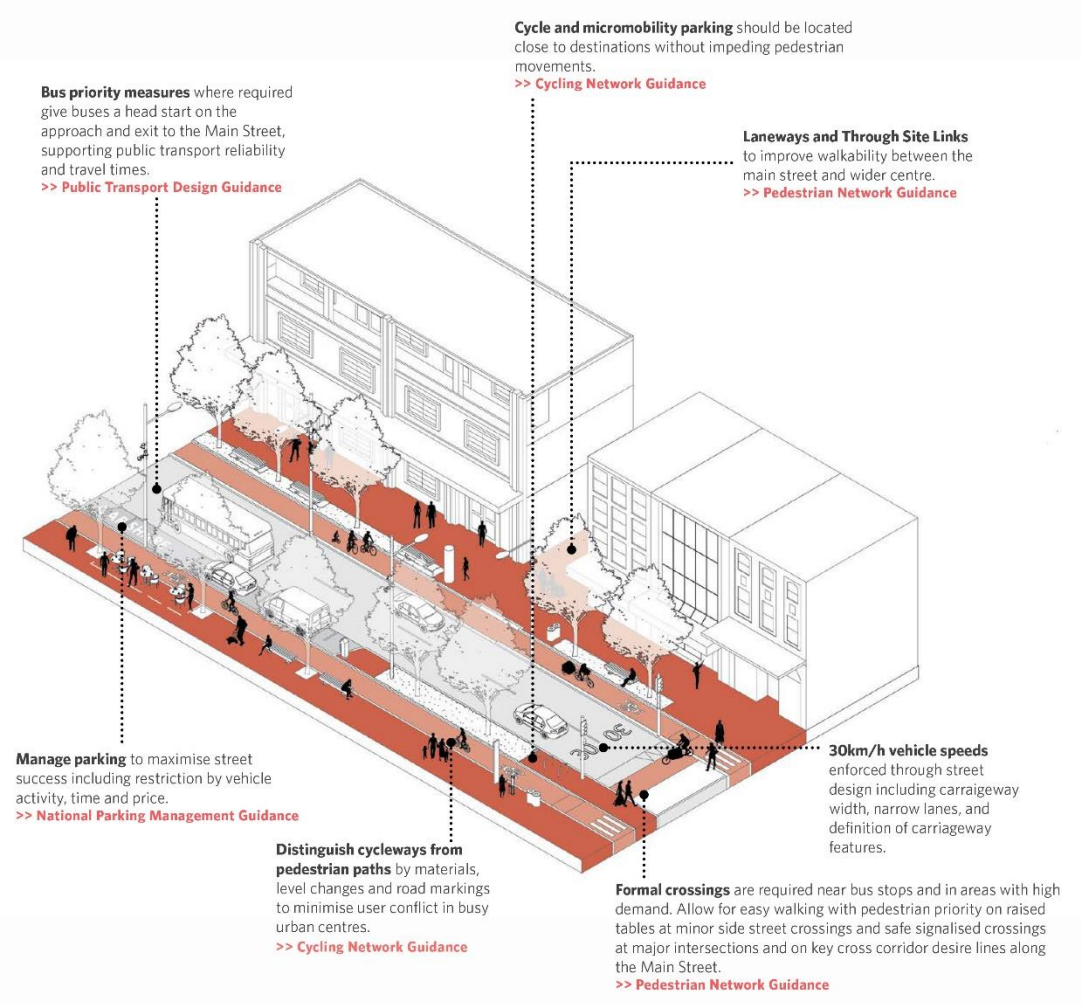


Figure 3 - Illustration from 'Aotearoa urban street planning and design guide' - 4.0 Creating good urban streets – 'Main' (20m) streets (Illustrations and associated guidance are indicative only)

75. To further illustrate the spatial requirements of a typical 20m corridor width, I have prepared the following street cross-sections - **Figures 4 and 5**, for a Commercial Zone based on the Waka Kotahi guidelines[7] for minimum dimensions for 'Main' streets. These are:

    (a) For 'main' streets in pedestrian districts – footpath area width of **6.65m** is recommended (not including provision for outdoor hospitality);

[7] (Footpath width | Waka Kotahi NZ Transport Agency (nzta.govt.nz)

(b) For cycle routes with peak period (150 – 500) base widths of one-way separated cycleways are recommended in the guidance[8] as **1.8m** (x2), not including separators or protection edges; and

(c) A bus/vehicle traffic lane is recommended to be **3.5m** and a bus parking lane of 3m, as per guidance on the Waka Kotahi website[9].

76. These dimensions are described as minimums in the guidance. They add up to **23.90m** not including any additional bus stop widths (3.0m) or car parking areas (2.0m) which would have to be absorbed in the footpath dimension.

77. The cross-sections in **figures 4 and 5** below apply these dimensions in the context of the proposed surrounding proposed building heights and existing road corridor 20m width, and **figure 5** also shows the proposed 1.5m setback area. The cross-sections give an indication of spatial potential for cycle, cars, public transport and pedestrians, and space to provide for street trees and street furniture.

Figure 4 – Typical cross-section showing a 20m wide commercial 'Main' street. (NTS)

[8] Separated cycleways | Waka Kotahi NZ Transport Agency (nzta.govt.nz)
[9] Microsoft Word - #Bus Infrastructure Guidelines - FINAL_July 11.doc (nacto.org) page 10 (referenced on the Waka Kotahi website).

Figure 5 – Typical cross-section showing a 20m wide commercial 'Main' street with a 1.5m setback. (NTS)

78. I acknowledge that streetscape design is complex and is likely to require additional space for traffic safety provisions and infrastructure elements. However, based on these cross-sections, I consider that it would be difficult to provide space for adequate pedestrian route widths within a total corridor of 20m in width. The Waka Kotahi guidelines recommend a total of 6.65m for a combination of kerbs (.15m), street furniture (2.5m), a pedestrian through route (3m), and building frontage area (1m). The cross-section shows that in a 20m corridor this dimension is reduced to 4.7m. Some of this pedestrian space may also be required for tree planting, bus stops and car and cycle parking. The remaining pedestrian space may be reduced to about 1.8 including the building frontage area for door opening and people gathering around entrances.

79. The additional proposed 1.5m setback space shown in **Figure 5** as the blue area would potentially provide for building frontage areas, pedestrian movement, door opening, and some outdoor hospitality. This would still not

achieve the minimum 3m pedestrian route recommended in the Waka Kotahi guideline, however.

80. Other space considerations are provisions for wheelchair access, blind delineators (in shared space), and leases to occupy footpath areas for outdoor hospitality.

81. In the context of taller buildings in Town and Local Centre Zones, being able to incorporate trees of a scale that balance with the building heights would be beneficial for landscape and environmental amenity reasons. The proposed setbacks would provide greater opportunities for larger tree species and canopy spread. This canopy area difference is shown in the cross-sections.

82. In my opinion, the proposed 1.5m setback that this QM entails would provide for additional street frontage space that could contribute to a better functioning commercial street environment.

Residential Zones 4m proposed setback

83. Under PC14, Residential Zones typically have 1.5m setbacks from road boundaries. The purpose of the proposed greater 4m setback along the city spine transport corridor boundaries in MRZ and HRZ is to provide adequate space to incorporate private residential and public realm amenity through tree planting (and other landscape treatments).

84. In my opinion, achieving this is part of creating a well-functioning urban environment in the Residential Zones of the corridor, and would contribute to the following benefits:

    (a) Improved landscape and environmental amenity with space for street edge trees, as well as other planting;

    (b) Improving residential amenity for building occupiers and neighbourhood residents;

    (c) Improving residents' outlooks onto the corridor from medium and high-density residential developments;

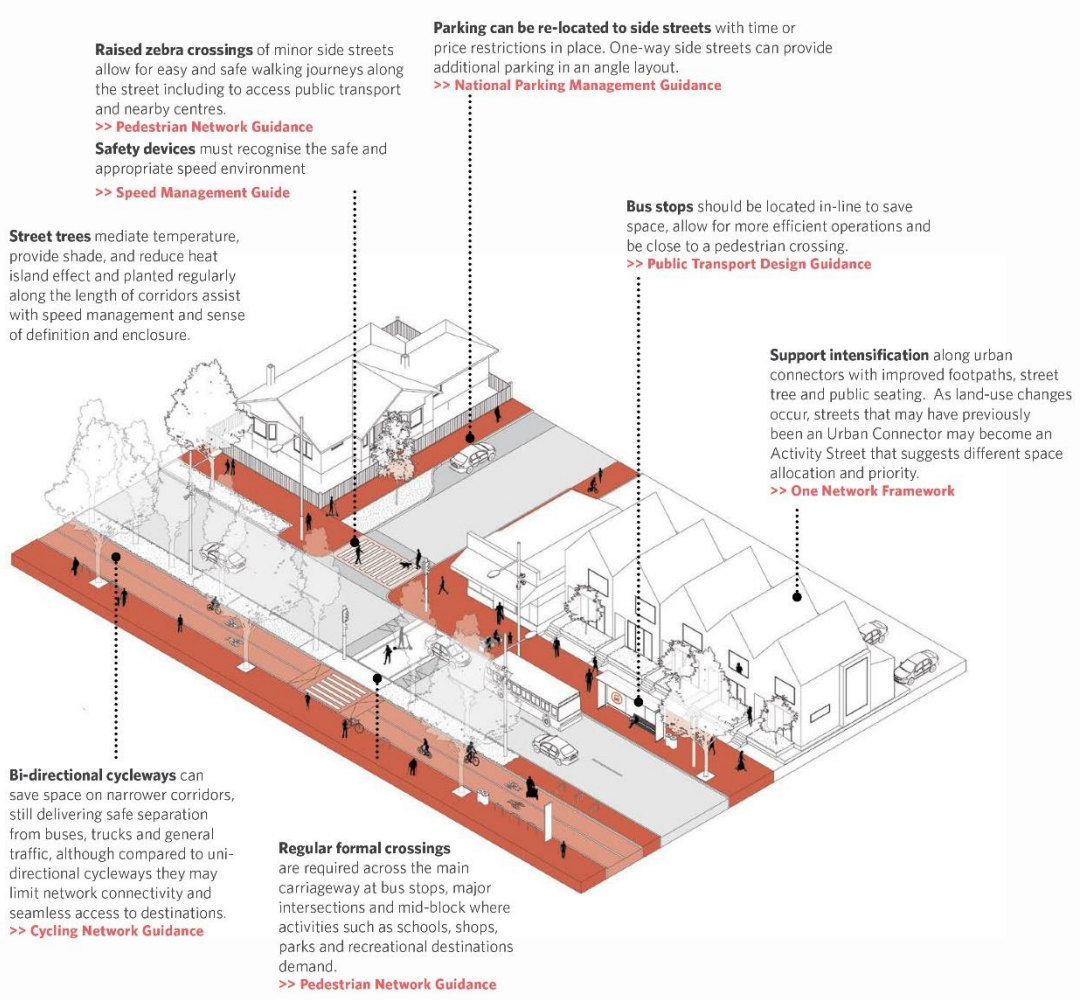
    (d) Enhancing the environment for pedestrian street-users including people with disabilities, seniors, and children by providing shade, visual interest, and softening of the built environment;

(e) Enhancing public transport users' appreciation of the corridor, including those waiting at stops;

(f) Enhancing the experience of users of vehicles and cycles moving along the corridor; and

(g) Increasing neighbourhood and civic pride and thereby helping to potentially reduce anti-social activity along the corridor (a CPTED matter).

85. In the 'Aotearoa Urban Street Planning and Design Guide'[10], "Urban Connector" streets (20m wide) are closely aligned with the City Spine Transport Corridor. The illustration below – **Figure 6** is from this document. It indicatively shows the spatial allocation of anticipated activities and uses in a 20m wide 'Urban Connector' street. In my opinion, this is similar to what could be expected to be accommodated in and along the corridor.



[10] Aotearoa urban street planning and design guide - All updates | Waka Kotahi NZ Transport Agency (nzta.govt.nz)

Figure 6 - Illustration from 'Aotearoa urban street planning and design guide' - 4.0 Creating good urban streets – Urban Connector (20m) streets (Illustrations and associated guidance are indicative only)

86. In addition to this illustration, I have prepared the following cross-sections based on Waka Kotahi guidance[11] for minimum footpath dimensions for 'Urban Connector' streets with:

    (a) A recommended minimum footpath width dimension of **3m** (or 4.8m on 'Activity' streets alongside parks, schools, or other generators);

    (b) For cycle routes in peak period (150 – 500), base widths of one-way separated cycleways are recommended as **1.8m**[12];

    (c) A bus traffic lane is recommended to be **3.5m**[13]; and

    (d) A **3.2m** vehicle lane is shown. This does not include traffic design road geometry provisions such as painted mediums or turning radii areas.

87. These dimensions are described as minimums in the guidance. They add up to **23m**, not including any car parking areas (2.0m) which would have to be absorbed in the footpath dimension or bus lane. This is not achievable in a 20m wide corridor. This leaves a footpath width of 1.5m which is an extremely minimal width in this context. No space is available for tree planting pits within the road reserve based on these dimensions.

88. The following **Figures 7 and 8** - illustrate indicative cross-sections with width layouts based on these dimensions, with a proposed 4m qualifying matter setback and a 1.5m residential setback.

[11] Footpath width | Waka Kotahi NZ Transport Agency (nzta.govt.nz)
[12] Separated cycleways | Waka Kotahi NZ Transport Agency (nzta.govt.nz)
[13] Microsoft Word - #Bus Infrastructure Guidelines - FINAL_July 11.doc (nacto.org) page 10 (referenced on the Waka Kotahi website).

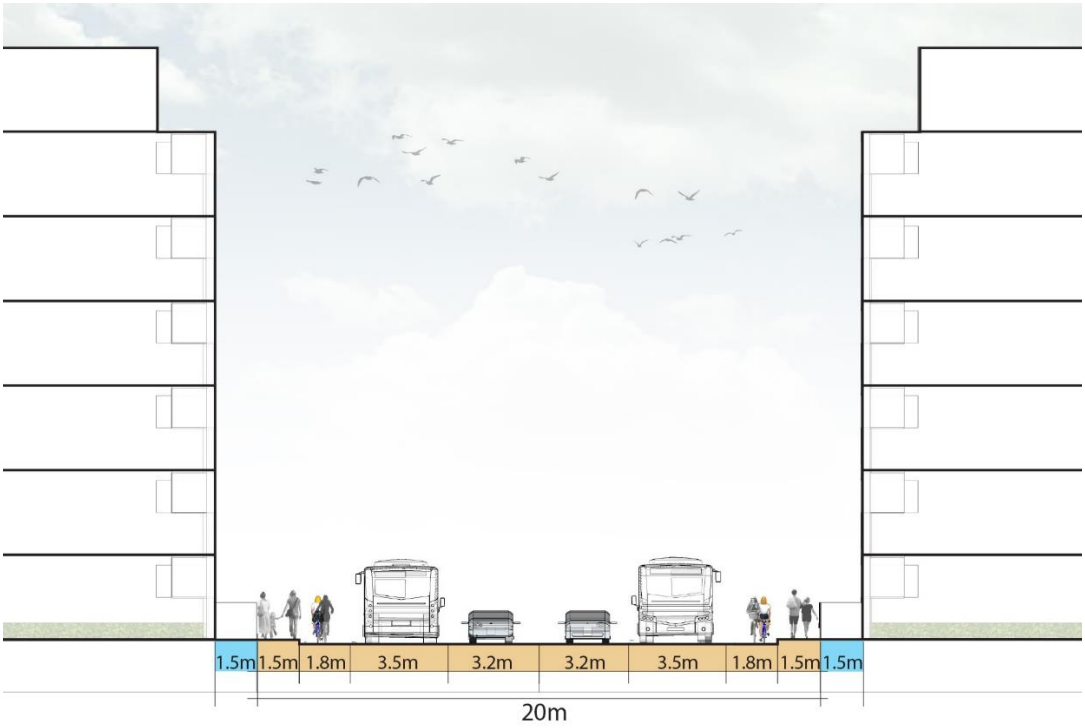


Figure 7 - indicative cross-sections with the 1.5m residential setback (NTS)

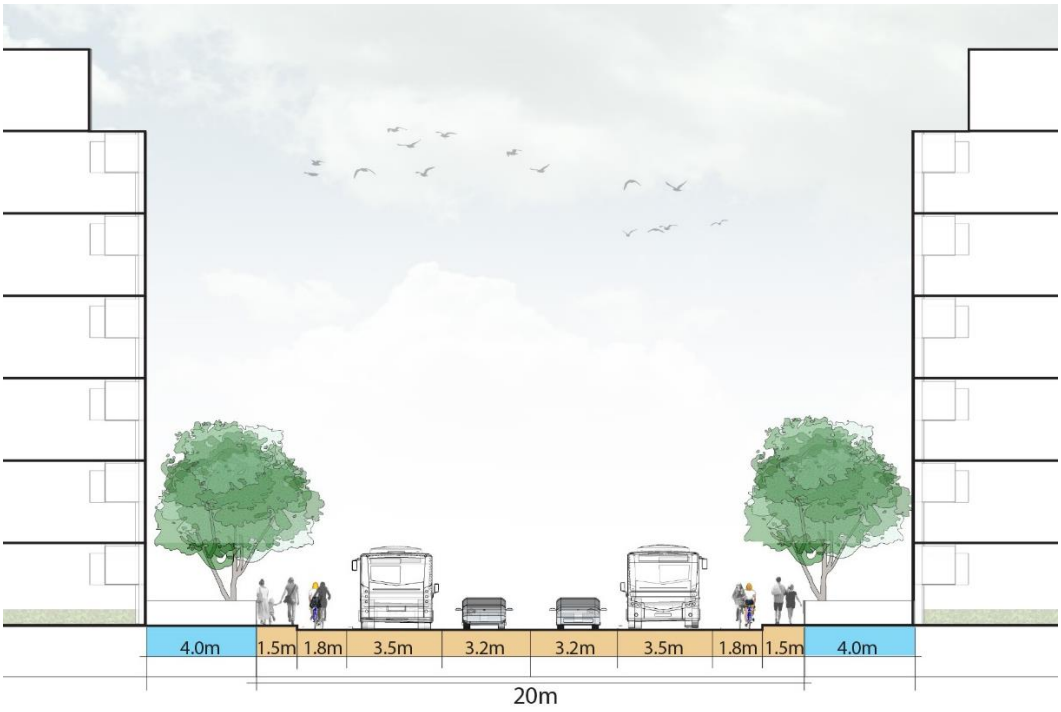


Figure 8 - indicative cross-sections with the 4m residential setback with tree planting. (NTS)

89. The visualisations below illustrate the comparative benefits of providing building setback space for tree planting along the corridor edge. In **Figure 9**, the 1.5m setback is shown in relation to the anticipated corridor and buildings that represent the overall provisions for high density residential development. **Figure 10** illustrates the same buildings and corridor with a 4m setback.

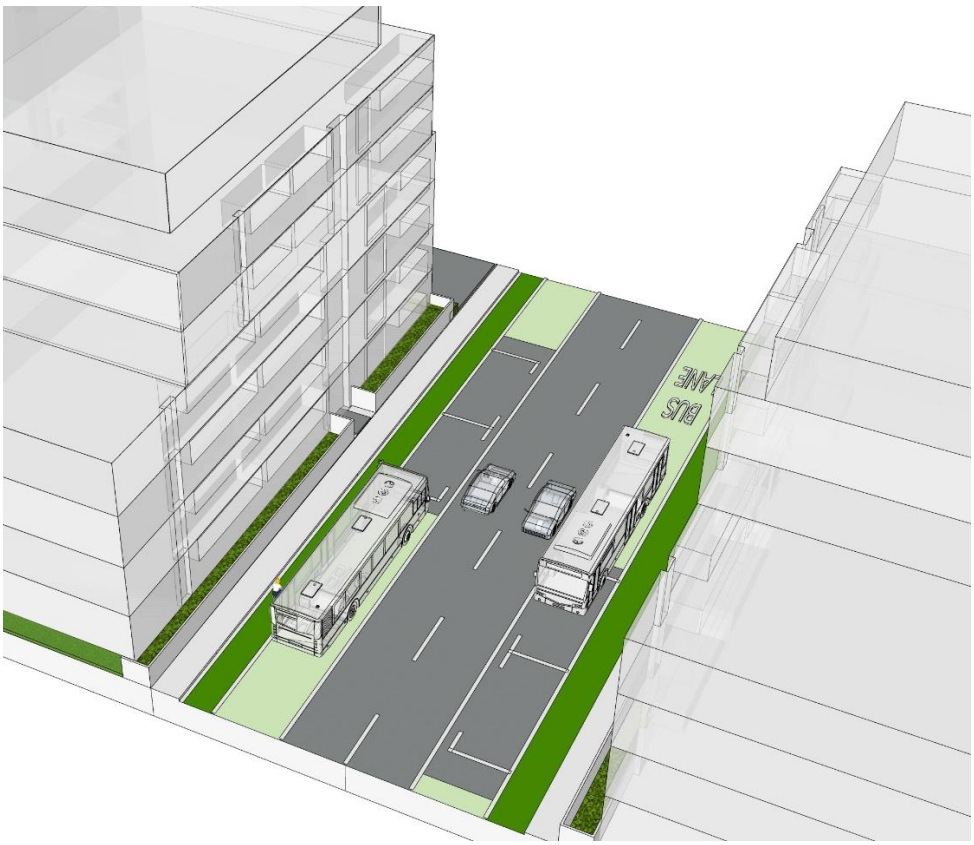


Figure 9 – Visualisation showing a commercial ‘Urban Connector’ street with 1.5m setback and no trees.

Figure 10 – Visualisation showing a commercial ‘Urban Connector’ with 4m setback and tree planting.

90. I consider that the proposed 4m setback provision would provide space for very beneficial landscape and environmental amenity on either side of the corridor through garden tree planting. A planted continuous edge character to the corridor would help to visually soften and enhance this important development and transport corridor, making it more pleasant and desirable as a place to live and to use as a transportation corridor and neighbourhood.

91. In my opinion, from an urban design perspective, a rule requiring tree planting within the setback frontage area is warranted, in conjunction with the City Spine Transport Corridor Residential Zone 4m setback rule, as follows:

> *"Rule - Tree planting shall be provided: 1 tree per 10 metres of road boundary or part thereof, planted within the road boundary building setback area."*

Key pedestrian frontage

92. As noted above, OCHT and Kāinga Ora consider *"there is a direct conflict in urban design outcomes (and rules) where the Key Pedestrian Frontage rules require buildings to be built up to the road boundary to deliver good urban design outcomes and facilitates a continuous street edge (often with veranda cover for pedestrians)."*

93. Key pedestrian frontages are identified on the operative planning maps under *15.4.2.3 Building setback from road boundaries/ street scene*. These are located for approximately:

    (a) 350m from Brake Street to Auburn Avenue (north side only) on Riccarton Road (Church Corner shopping area);

    (b) 420m length from 134 - 87 Riccarton Road (Riccarton/Westfields shopping area);

    (c) 200m from 172 to 235 Papanui Road (Merivale shopping area); and

    (d) 550m length of Papanui Road (Northlands/Papanui shopping area).

94. Under the Operative Plan, buildings in these areas are required to be built up to the road boundary except for a permitted setback of up to a maximum of 4m from the road boundary for a maximum width of 10 metres.

95. This key pedestrian frontage rule allows for and anticipates frontage modulation to occur to some extent. It permits a greater setback than the proposed City Spine Transport Corridor commercial setback of 1.5m.

96. In principle, I agree with this submission in that the likely outcome of introducing the proposed commercial setback is somewhat irregular alignments of commercial frontages. This outcome would visually interrupt the continuity of the street edge and potentially affect some shop window and entrance profiles and create some visually exposed 1.5m lengths of building side walls. Ideally commercial street edges should have a uniform coherence providing for actives edges, vibrancy, and legibility of commercial activities and spaces.

97. However, I consider that the proposed 1.5m setback would still:

    (a) provide for a degree of commercial street edge cohesion;

    (b) avoid creating narrow or deeply recessed entrapment areas (CPTED principle);

    (c) retain the potential for providing active engagement with and contributing to vibrancy and attractiveness along the street edge; and

    (d) allow over time, as buildings align, for edge cohesion to occur, which is a likely outcome in my view.

98. In terms of meeting the matters of discretion under *15.13.1iii Urban design* (proposed new 15.14.1 under PC14) in that a proposal *takes account of nearby buildings in respect of the exterior design, architectural form, scale and detailing of the building,* I consider that the setback would not fully address this matter initially (given the potential misalignment in frontages, however, in time, buildings would become more aligned (including in respect of this matter of discretion).

99. The following photographs (**Figures 11-13**) illustrate existing examples of situations where buildings are set back from commercial street boundaries. In these photographs, the setback distances appear to be greater than that the proposed 1.5m. In many instances, property owners have utilised these setback areas creatively to add to the vibrancy of the streets with outdoor dining, tree planting, and threshold treatments to buildings.

Figure 11 - Victoria Street in Christchurch. (Source: © 2023 Google Earth Street View)

Figure 12 - Riccarton Road in Christchurch. (Source: © 2023 Google Earth Street View)

Figure 13 - Parnell Road in Auckland. (Source: © 2023 Google Earth Street View)

100. The proposed commercial setback would have the initial effect of modulating the building frontages along the corridor route, however I consider that this initial outcome would be outweighed by the long-term benefits of achieving a wider corridor for more effective use and providing for a more well-functioning commercial urban street environment.

Conclusions

101. In conclusion, I support the proposed City Spine Transport Corridor qualifying matter setbacks for the following reasons:

    (a) Increased space for better building access could be created in commercial streets;

    (b) Footpaths and building frontages could be better integrated, making the accessibility of the street improved in commercial streets;

    (c) Greater street tree canopy space can be accommodated in commercial streets;

    (d) Some outdoor hospitality may be able to be incorporated into commercial street environments; and

    (e) Tree and landscape planting could enhance and improve the street environment of residential streets along this busy corridor.

102. I consider that the setbacks would provide greater opportunities and flexibility for better integrated land use and street design along the corridor. In the short- to medium-term, this may not be required, however I consider that future generations are likely to need more unbuilt street edge space to accommodate uses and benefits associated with intensification.

103. That said, I accept that there would be some loss (to varying degrees) of development capacity in commercial and Residential Zones along the corridor arising from this QM.

104. I also accept that initially there would be modulation of the street front facades along the edges of the Commercial Zones, which is not an ideally urban design outcome. I consider the adverse effect of this is outweighed by the long-term urban design benefits.

105. Finally, I consider that the proposed Residential and Commercial Zones proposed QM setback for the City Spine Transport Corridor would help to achieve Policy 1(c) of the NPS-UP: *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport*, and would contribute to a well-functioning urban environment in the long-term.

PART 2 - CHAPTER 7 TRANSPORT

106. In the following evidence, I provide urban design evidence on submissions made in relation to the following provisions notified in PC14:

    (a) 7.4.3.7b - Access design (pedestrian access);

    (b) 7.5.7.h - Access design, including 7.5.7. Appendix - Minimum requirements for private ways and vehicle access;

    (c) 7.5.3.1 (Table) - Minimum numbers of loading spaces required;

    (d) 7.4.3.13 - Vehicle crossings provisions; and

    (e) 7.4.4.3 a.v - Minimum number of cycle parking facilities required.

107. My evidence addresses these matters in this order with comment on the submissions included.

7.4.3.7b - Access design

108. This rule has been commented in the following submissions:

    (a) Submission #842 – FENZ;

    (b) Submission #823 - The Catholic Diocese of Christchurch; and

    (c) Submissions #814 - Carter Group Limited

109. This rule in the notified PC14 proposes that:

> *"For developments of three or more residential units, each unit shall be accessed by either a combined vehicle-pedestrian access or a dedicated pedestrian access that is a minimum of 3 metres in width with a formed pathway of at least 1.5m; and each access shall be from the street to the front door of the unit and any garage or parking space for that unit.*
>
> *Any pedestrian access longer than 50m with a formed width of less than 1.8m shall provide passing opportunities with a minimum length of 2m and a minimum width of 1.8m at least every 50m."*

110. The reasons for including the above minimum pedestrian path width dimension are to ensure that pedestrian accesses within residential developments would meet the needs of occupants by providing for:

(a) The safety and security of people using the pedestrian access and those occupying residential units (in accordance with CPTED) by providing for personal passing space and visibility;

(b) Privacy separation distances from paths to windows from internal habitable spaces;

(c) Adequate space for use by persons with a disability or with limited mobility;

(d) Spaces for some landscape planting treatment along the routes;

(e) The ability for cyclists to access cycle storage areas safely and conveniently;

(f) Space to manoeuvre household furniture and other items in a reasonably convenient manner;

(g) Access width for the transportation and storage of rubbish and recycling bins; and

(h) Space for lighting.

111. The following are two examples of narrow pedestrian accessways through recently constructed developments – **Figures 14 and 15.**

Figure 14 - 200 Worcester Street (Christchurch), 4.0m (approx.) total narrowest width - 1.5m path, 2 x 1.0 bin enclosures, and 2 x .25m garden edges.

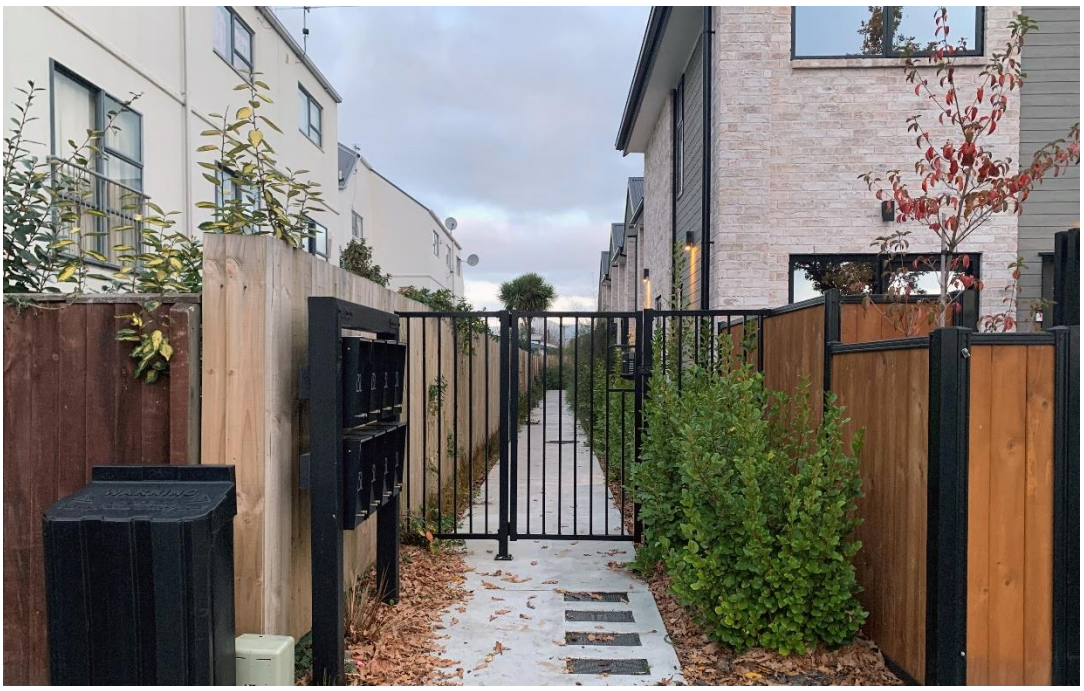


Figure 15 - 232 Worcester Street (Christchurch) - 2.8m (approx.) total width at narrowest point. - 1.5m path and 1.3 total garden edges.

Submission #842 - Fire and Emergency New Zealand

112. An additional reason for this proposed minimum pedestrian access width has been raised in submission #842 for FENZ, which states:

> *"To support effective and efficient access and manoeuvring of crew and equipment for firefighting, medical, rescue and other emergency response to developments across Christchurch city, Fire and Emergency require:*
>
> - *Pedestrian accessways that are clear, unobstructed and well-lit,*
> - *Wayfinding for different properties on a development are clear in day and night,*
> - *That developments give effect to the guidance provided in the Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access' (December 2021)7,*
> - *Pedestrian accessways have a minimum width of:*
>   - *3m on a straight accessway,*
>   - *6.2m on a curved or cornered accessway, and*
>   - *4.5m space to position the ladder and perform operational tasks."*

113. In my opinion, to accommodate the requirement for a *"straight, clear, unobstructed and well-lit"* accessway (as requested by the above submission), the 3m-wide pedestrian accessways would have to exclude potential obstructions such as cycle and bin storage, lighting poles/bollard, trees, and only comprise a minimum 1.5m-wide formed path and frangible low (below 1m in height) planting of approximately .75m width on either side.

114. The following elevation and plan illustrate how this minimum requirement could be implemented – **Figure 16** below.

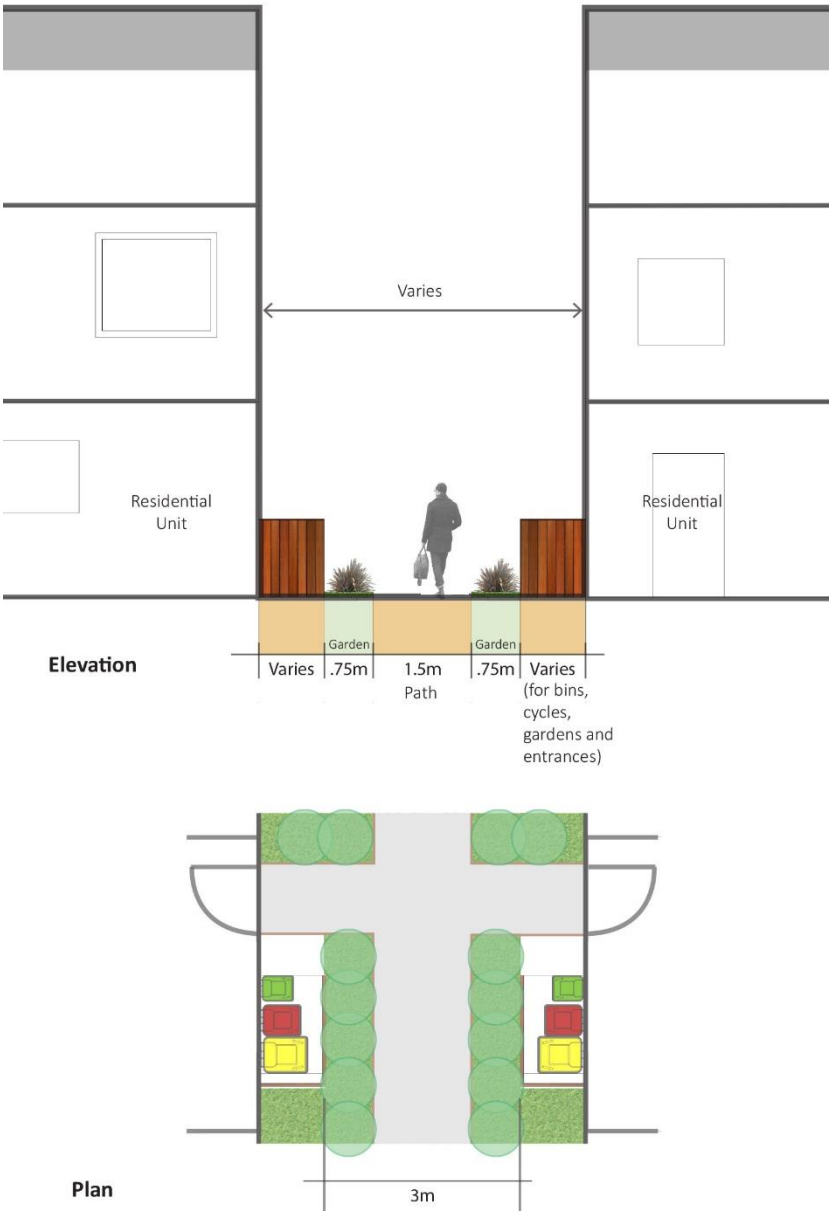


Figure 16 – Typical cross-section and plan showing how pedestrian access way could be provided as a minimum.

115. I consider that requiring a formed, unobstructed 3m-wide pedestrian accessway would be vulnerable to being colonised by cars and used for

casual parking and uncoordinated bin storage. It could also have a significant impact on the ability for these areas to be landscaped. Accordingly, I consider this request is significantly disadvantageous to residential amenity and would potentially undermine the quality of residential developments.

116. The FENZ submission also requests amendment to the matters of discretion 7.4.4.27 Pedestrian Access, which I support as a way of providing for alternative design solutions. Although fire safety is not my area of expertise, I accept that some discretion to assess proposals from a fire safety perspective, as well as other matters, would be useful. As a baseline minimum width, I support the clear 3m dimension for pedestrian accessways, as per the suggested change underlined below.

> ***7.4.4.27 Pedestrian Access***
>
> *a. The following are matters of discretion for Rule 7.4.3.7 b:*
>
> *i. whether the pedestrian access is suitable for use by persons with a disability or with limited mobility;*
>
> *ii. whether any alternative pedestrian access is provided and the formation and safety of that alternative;*
>
> *iii. the effects on the safety and security of people using the pedestrian access and those occupying residential units on the site;*
>
> *iv. the functionality of the pedestrian access to meet the needs of occupants including but not limited to the transportation of rubbish and recycling for collection and the ability for cyclists to safely access any private and shared cycle storage areas, and*
>
> *v. whether the pedestrian access is suitable for use by emergency services*

117. The FENZ submission also seeks a requirement for a minimum width of 4.5m between buildings and boundaries to enable the positioning of ladders along the pedestrian accessways. From an urban design perspective, I consider that the minimum width could appropriately be 3m. The requested 4.5m width would, however, accommodate many benefits from an urban design perspective such as CPTED, accommodating service areas, and providing for residential amenity outcomes through landscaping. These matters are often addressed when processing resource consent applications through the Residential design principles of rule 14.15.1 (matters of discretion).

Submission #823 - The Catholic Diocese of Christchurch and Submissions #814 - Carter Group Limited

118. These submissions oppose the inclusion of 7.4.3.7b Access design on the basis that they consider the provision to be "*onerous, subjective and otherwise unnecessary, … may not be appropriate or practicable in all cases".*

119. For the reasons explained above I do not fully agree with these submissions on this rule. I accept that development proposal may provide alternative solutions that are acceptable to achieve well-functioning pedestrian access. If this is the case, alternative solutions can be assessed through the consent processing under 14.15.1 Residential design principles. As a baseline provision, I consider that 7.4.3.7b Access design helps to ensure that well-functioning pedestrian access is achieved.

120. I continue to support the inclusion of 7.4.3.7b Access design, and the amendment of providing a clear route as I have described above.

7.5.7.h - Access design and gradient, including Table 7.5.7.1 – Minimum requirements for private ways and vehicle access.

121. This proposed rule 7.5.7.h Access design in the notified PC14 proposes that:

> *For the purposes of access for firefighting, where a building is located further than 75 metres from the nearest road that has a fully reticulated water supply system including hydrants (as required by NZS 4509:2008), 64 vehicle access shall have a minimum formed width of 3.5 metres and a height clearance of 4 metres. Such vehicle access shall be designed to be free of obstacles that could hinder access for emergency service vehicles.*

122. In the notified PC14 Table 7.5.7.1 – Minimum requirements for private ways and vehicle access, a minimum formed width of 3m is provided for 1 to 8 residential units (and a minimum legal width of 4m).

123. This matter has been raised in **Submission #842 – FENZ.** The FENZ submission requests that the minimum formed access width of 3.5m be increased to 4m for buildings located further than 75 metres from the nearest road. As I understand it, this is for emergency vehicle access at a width that provides for sufficient space for door opening and equipment access on each side of a parked emergency truck.

124. I support this request as I consider that the 75m length could potentially be associated with residential developments of a scale that would benefit from additional width for shared pedestrian and vehicle access. Exceptions may include small mid-block or infill developments.

125. As with pedestrian access discussed previously, I consider that provision for at least .6m wide planting strips on either side of accessways should be included to provide for:

    (a) foundation planting along the edges of units;

    (b) privacy separation along driveways/shared paths (in conjunction with passive surveillance windows along driveways);

    (c) opening space for windows and doors from units; and

    (d) boundary planting along fence lines.

126. These outcomes would contribute to the residential amenity and CPTED outcomes (as per the Residential design principles of rule 14.15.1).

127. To achieve this with a minimum formed accessway width of 3m (less than 75m in length), a legal width of 4.2m would be required. For a minimum formed width of 4m (greater than 75m in length), a legal width of 5.2m would be required. The current legal widths for vehicle accessways is 4m for 1-8 units. In my opinion, to accommodate the FENZ submission and good residential amenity outcomes, these legal widths should be increased in the *Table 7.5.7.1 – Minimum requirements for private ways and vehicle access.*

128. The following photograph shows the amenity benefits of boundary and building foundation planting along vehicle accessways in an existing medium density residential development – **Figure 17.**

Figure 17 - 298 Worcester Street (Christchurch)

129. In comparison, the following photograph shows a residential development with no planting along a driveway. In my opinion, this outcome does not provide for a high level of residential amenity – **Figure 18**.

Figure 18 - 338 Worcester Street (Chch), 3m formed accessway with no planting.

130. The FENZ submission also requests that the vehicle access be free of obstacles that could hinder access for emergency vehicles. Providing tree planting along driveways is often desirable to achieve a high level of

residential amenity, and at times mitigation of building bulk between neighbours. I consider that it is likely that carefully considered locations for trees can at times be accommodated along driveways in turning areas while still providing for clear emergency formed access width of 3-4m. I consider that opportunities for achieving this could be assessed under the 14.15.1 Residential design principles through consent processing (for developments over 3 units).

131. The FENZ submission also requests that a 6.2m width on a curved or cornered accessway should be required. I have concern that this may create areas where the accessway is excessively wide leaving residual areas where unplanned car parking, bin storage or other waste may be located. This is likely to be visible from the street down driveways and would undermine residential amenity to some extent. I consider that the proposed addition of the assessment matter above could address this emergency fire access matter.

Submission #823 - The Catholic Diocese of Christchurch and Submissions #814 - Carter Group Limited

132. These submissions oppose the inclusion of Appendix 7.5.7 Access design and gradient (and presumably the associated Table 7.5.7.1 – Minimum requirements for private ways and vehicle access) on the basis that; *are unnecessary and will result in unreasonable development costs, reduced development capacity, and/or onerous consenting requirements.*

133. For the reasons explained above I do not fully agree with these submissions on this provision. I accept that development proposals may provide alternative solutions that are acceptable to achieve well-functioning access ways. If this is the case, alternative solutions can be assessed through the consent processing under 14.15.1 Residential design principles and other matters of discretion. As a baseline planning provision, I consider that 7.5.7.h Access design and gradient, including Table 7.5.7.1 – Minimum requirements for private ways and vehicle access, with the urban design recommendations incorporated, would help to ensure that well-functioning vehicle access is achieved with amenity, safety, and fire emergency access addressed.

7.5.3.1 (Table) - Minimum numbers of loading spaces required.

Submission #823 - The Catholic Diocese of Christchurch and Submissions #814 - Carter Group Limited

134. The above submitters also oppose the inclusion of 'Table 7.5.3.1 – Minimum numbers of loading spaces required' on the basis that:

> *"the requirements are prescriptive and inflexible, and any loading needs are best determined by the developer accounting for the needs of future residents, or informally provided as required (including through on-street loading facilities)."*

135. The proposed loading space provisions aim to accommodate private vehicle, van and truck pick-up and drop off, rubbish collection, and service vehicles to avoid reliant on roadside access that may lead to conflicts with transport network functions such as stationary vehicles blocking the carriageway or footpath creating adverse safety impacts such as visibility constraints, unsafe vehicle manoeuvres and effects on pedestrian safety and amenity.

136. In my opinion, based on having assessed many resource consent applications for medium density residential developments (in Residential Medium Density zones in the operative Plan), I consider that loading space requirements at the lower end of the development scale (approximately under 20 units), are not likely to be necessary in the short- to medium-term. Loading for smaller scale development can in many instances function adequately from the road frontage areas especially if loading provisions are incorporated into street design over time.

137. However, I acknowledge that there is no guarantee that on-street loading spaces will be provided in the future. I consider that this issue may become more pertinent over time under the new residential density provisions and may require reassessment as successive residential developments cumulatively impact of the public realm of surrounding streets.

138. I have some concern that developments that do not provide for rear parking and service areas may be required to provide a loading space at the street frontage of the development sites. In my opinion, this is likely to partly restrict the ability to create good street relationships between buildings and the public realm and could reduce the amenity of street frontages.

139. In my opinion, required loading spaces should be restricted to the rear of developments so that they are not seen from streets, or internalised in a way that does not detract from the amenity of the frontages (and site and surroundings). I consider that the *14.15.1 Residential design principles - g. Access, parking and servicing*, provide for assessment matters to manage the potential adverse effects of loading spaces. However, I also recommend that avoiding loading bays being located at the street frontages should be addressed in PC14.

140. To respond to this concern above, I understand that a proposed amendment to *14.5.2.15 Garaging, loading spaces and carport building location,* is now recommended requiring that loading space on a front site shall be located 1.2m behind the front façade (in MRZ), and behind the rear façade of a residential unit in HRZ. For the reasons outlined above, I support this amendment.

141. This amendment does not remove the loading space requirement as requested by the submitters. However it would, in my opinion, provide for a better street front relationships and amenity outcomes for residential developments over 20 units in size.

Rule 7.4.3.13 - Co-location of vehicle crossings

142. This rule proposes as follows in respect of *"any new vehicle crossing in an urban area"*:

    a) no more than two adjacent sites shall share a single vehicle crossing;

    b) the total width of a vehicle crossing shared between two adjacent sites shall not exceed 7m; and

    c) *the minimum distance between a shared vehicle crossing and any other vehicle crossing shall be 13m.*

143. This provision has been commented on in the following submissions: **Submission #823 - The Catholic Diocese of Christchurch, and Submissions #814 - Carter Group Limited.**

144. These submissions oppose the inclusion of the requirements in rule 7.4.3.13 (referred to in rule 7.4.3.8) as "*unnecessary, onerous and impractical".* Among other concerns, the submitter notes that the rule creates a 'first in first

served' situation for vehicle crossings which in greenfield residential areas may be problematic where adjoining sites are designed and / or obtain building consent, resource consents and / or vehicle crossing permits at a similar time with no knowledge of adjacent crossing positions.

145. In my opinion, where possible the co-location of vehicle crossings in residential street environment improves the safety and amenity of the street environment by minimising potential conflicts between pedestrians, cycles other vehicles, and it provides for more opportunities for creating better street frontages with buildings and garden planting. It also potentially provides for more on street parking spaces or street tree planting locations.

146. As I understand it, this proposed rule would mean that further subdivision of existing lots would require existing co-located accesses to be shared with the new subdivided lot(s). If the existing lot has one standalone access, then one new one could be added adjacent to this if it is 13m away from an existing co-located crossing.

147. While I appreciate that there may be situations where this rule may create the need for a greater level of co-ordination between developments, this rule would provide a trigger for managing the potential adverse effects of many multiple crossings along street frontages particularly where infill intensification is occurring. This would occur through the following assessment matters of discretion:

7.4.4.28 - Vehicle Crossing Co-Location Layout

(a) The following are matters of discretion for Rule 7.4.3.13:

(i) the effects on the safety of pedestrians and cyclists from additional vehicle crossings;

(ii) whether the proximity of vehicle crossings to one another, or the width of shared vehicle crossings, detract from the streetscape amenity of the local area; and

(iii) whether the co-location of vehicle crossings results in improved traffic safety or streetscape amenity outcomes compared to separate vehicle crossings.

148. On this basis, I support the rule to avoid situations where three or more adjacent driveways could be created. This could create an adverse

dominance of hardstand asphalt or concrete areas, removed or reduced planting, and concentrated vehicle movements adjacent to street public realms and within new residential developments.

7.4.4.3 a.v - Minimum number of cycle parking facilities required

149. This provision has been commented on in **Submission #170 - John Lieswyn**.

150. This submission seeks amendment to the wording of 7.4.4.3 a.v - Minimum number of cycle parking facilities - *Whether the provision, design and location of cycle parking facilities may disrupt pedestrian traffic, disrupt active frontages, or detract from an efficient site layout (…)* The submitter asserts that "'*efficient site layout' is a get out of jail free card for developers and should be struck from the Plan"* – I understand the concern to be that inadequate cycle facilities could be provided as a result.

151. In my opinion, *"efficient site layout"* and the cycle parking provisions are not mutually exclusive, and the intent of that provision is for both to be achieved. However, the submitter is perhaps correct that this could be misinterpreted as giving efficient site layout priority. To address this, and provide consistency of language in the plan, I consider that this matter in 7.4.4.3.a.v. could adopt the terminology of 14.15.1c.i. (Residential design principles) and replace the term *"efficient"* with *"logical and coherent site layout"*. To my mind, these terms more clearly emphasise the importance of well-integrated site design that includes all provisions:

> *Whether the provision, design and location of cycle parking facilities may disrupt pedestrian traffic, disrupt active frontages, or detract from ~~an efficient~~ a logical and coherent site layout or street scene amenity values.*

Conclusions

152. In conclusion, I consider that providing minimum widths and other requirements for transport aspects of residential developments will ensure that fundamental site planning and design considerations are addressed at the outset of development design.

153. I acknowledge that there are often alternate design solutions in some situations and consider that given the resource consent trigger for medium-density residential development in MRZ or HRZ is 4 units or more (as a

restricted discretionary activity), then alternative options can be assessed on a project-by-project basis through the matters of discretion, if need be.

PART 3 - CHAPTER 13.5 SPECIFIC PURPOSE (HOSPITAL) ZONE (SPHZ)

154. As mentioned above, I authored the Technical Report that was appended to the Section 32 report for the revised provisions for Specific Purpose School and Hospital Zones. In the Technical Report, I assessed the potential impacts and outcomes of the currently permitted and enabled built form standards for the SPHZ, in relation to development in adjoining HRZ (in accordance with the standards applying in that zone) and in light of the objectives and policies for the SPHZ.

155. The SPHZ Objective and Policies 13.5.2 provide a framework within which the proposed built form standards for each site are to be assessed.

156. The operative SPHZs affected by proposed HRZ and addressed in the Technical Report were:

    (a) Inner urban sites (13.5.4.2.3) – St Georges Hospital, Southern Cross, Pegasus Health 24hr (former);

    (b) Inner urban sites (13.5.4.2.4) – Nurse Maude Hospital, Nurse Maude-Mansfield, St Georges-Heaton Overlay, Wesley Care;

    (c) Former Christchurch Women's Hospital (13.5.4.2.5); and

    (d) Montreal House (13.5.4.2.7).

157. In summary, I considered that the above SPHZs could be arranged and distinguished into two groups, being Large Inner Urban Sites and Small Inner Urban Sites. My recommendations are set out on page 25 of the Technical Report, with the aim being to address differences in scale and context of the two groups, and to provide for a greater consistency of proposed built form standards.

158. Except where I expressly recommend otherwise, following a review of submissions below, I continue to support, in principle, the recommendation in the Technical Report for the reasons given in that report. This is apart from proposed changes to the provisions for the Former Christchurch Women's Hospital.

159. I did not review Christchurch Hospital in the Technical Report because the permitted building height is 60 metres, which is already beyond the 36-metre maximum height for the HRZ which I understand the Council now proposes in response to policy 3 of the NPS-UD.

160. Post-submissions, the issues that have emerged for the SPHZs are site-specific matters relating to the Former Christchurch Women's Hospital and Montreal House sites.

161. Since preparing the Technical Report, I understand that the HRZ permitted building heights are now proposed to be increased. These heights are now:

(a) HRZ - heights increased from 20 to 22m permitted (18m with a 2m setback then up to 22m) – approximately 6 storeys. Refer to **Figure 19** below.

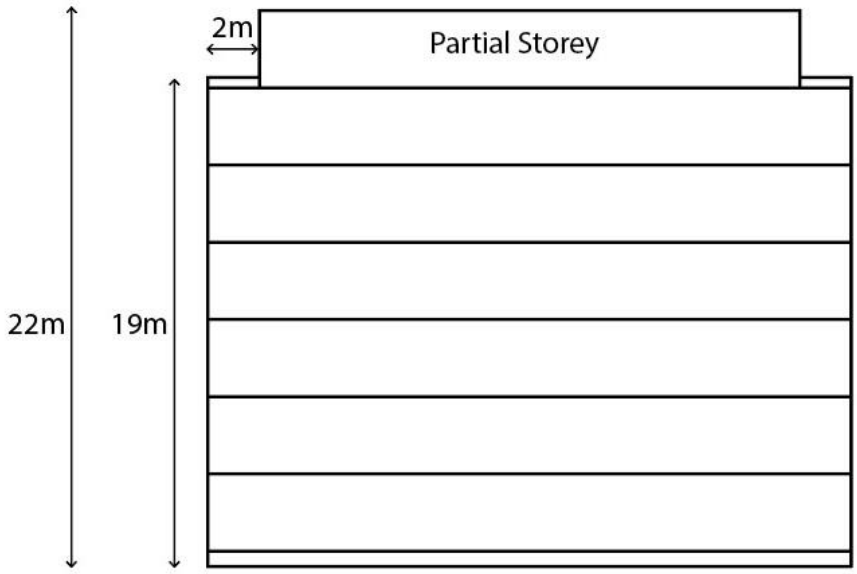


Figure 19 – Diagram illustrating the proposed heights for High Density Residential Zones.

(b) HRZ 'Central City Residential Precinct' – 32m to 39m permitted (plus 3m for roof and plant) - approximately 10 storeys).

162. As I understand it, these proposed changes are in response to requests by submitters to increase economic feasibility and incentives for investment.

163. I note that other proposed HRZ provisions (no recession plane requirement at the street frontage for the first 20m up to 14 metres in height (rule 14.6.2.2 *Daylight recession planes - Height in relation to boundary*) are likely to encourage perimeter block configurations of buildings with open space and some rear undeveloped areas due to the 50% site coverage standard and the proposed frontage enablement.

164. Further to the proposed changes in HRZ heights, the following changes have been proposed for the SPHZs:

(a) Built form standards – Height in relation to boundary to be aligned with the proposed HRZ recession plane height in relation to boundary to reflect the surrounding commensurate built form.

(b) For ‘Large Inner Urban’ sites, road setback being 10m except along Papanui, Bealey, Colombo, and Durham where it would be 4m.

(c) HRZ recession plane requirements added to all SPHZs adjacent to HDZ boundaries.

165. The proposed HRZ heights and setbacks, existing operative plan SPHZ outlines, and the above changes to SPHZ heights and setbacks have been represented on updated cross-sections attached to this evidence as **Appendix B.**

166. The overarching approach taken in the previous technical reporting work (and in this evidence) has been to align the anticipated urban form of SPHZs with HRZ (and commercial centres). This approach broadly aligns the anticipated built form of future hospital buildings with the surrounding residential zones while also having some provisions for particularities of hospital uses. It is also consistent with the overall anticipated strategic urban form provisions.

Larger Inner Urban Sites - St Georges Hospital, and Southern Cross

167. These proposed changes would affect the Inner urban sites (13.5.4.2.3) – St Georges Hospital and Southern Cross by increasing the enabled height in the SPHZ to 22m. This is to align with the adjoining proposed amended HRZ height. By increasing the SPHZ height commensurately, I consider that a more overall consistent and coherent urban built form outcome would be achieved over time. This would also encourage more intensified and contained use of the SPHZ within existing site boundaries (as per 13.5.2.1.1 Policy – Intensification).

168. It is noted that previously in the notified version, the 18 metres height at 16 metres from the boundary was not accommodated in the proposed rules package and limited enablement. This has now been incorporated as an amendment.

169. For ‘Large Inner Urban’ sites, the proposed heights are:

(a) Permitted height of 22m at 10m setback from boundaries.

(b) Permitted height of 22m at 4m from arterial boundaries.

170. Where I had previously recommended an increase to 20m enabled heights on these SPHZ sites, I now consider that the height could be increased to 22m to align with the HRZ. Analysis of the 20m HRZ height was undertaken in the notified Section 32 Technical Report - Urban Design Medium and High Density Residential Zones[14] and in the evidence of Mr Hattam – Senior Urban Designer at Christchurch City Council. On the basis of this information, potential overshadowing effects and building dominance on adjoining High Density Residential Zones, I consider would need to be managed on the hospital sites through matters of discretion and rules.

171. As I highlighted in the notified technical report for SPHZs, I have concern that the lack of a site coverage rule for SPHZs could allow for large buildings to be constructed adjacent to HRZs. I consider that this potential risk is manageable with the following rules:

(a) 10m internal boundary building setback (13.5.4.2.3b);

(b) max. 30m building length (RD13ii A. B.);

(c) 1000m^2 GLFA trigger (RD10a.); and

(d) matters of discretion (13.5.5).

172. I also consider that along local road and residential boundaries, retaining 10m setbacks could accommodate medium-scale trees (approximately 12m height and 10 spread) and the requirement for a minimum of tree planting of 1 tree per 15 metres along internal boundaries, or part thereof (13.5.4.2.3.d.ii B.) would provide visual softening of any potentially larger buildings.

Smaller Inner Urban Sites - Former Pegasus Health 24hr, Nurse Maude Hospital, Nurse Maude-Mansfield, Wesley Care, Former Christchurch Women's Hospital and Montreal House

173. The currently operative height limits for these SPHZ sites are 11m (and 20m - enabled) or 18m (with a 16m setback). The proposed changes would increase the permitted height to 22m. As with the larger sites, I consider that alignment of proposed built form standards with the neighbouring HRZ increased heights, is likely over time to create an overall consistent and coherent urban form outcome. This would also enable more intensified and

[14] PC-14-Residential-Chapter-Technical-Analysis-Urban-Design-v2.pdf (ccc.govt.nz)

contained use of these SPHZs within existing site boundaries (as per 13.5.2.1.1 Policy – Intensification.

174. As with the large SPHZ sites, I consider that there is a risk that hospital buildings with no maximum site coverage constraints could result in potentially large buildings with continuous facades and potentially blank façades being constructed along the residential streets and internal boundaries. To address this, I consider the following provision should be included:

(a) 4m internal boundary building setbacks (13.5.4.2.4.a.);

(b) recession planes commensurate with HRZ (13.5.4.2.4.d. i.);

(i) North boundary – 60 degrees above 3m height with a 6m setback at the boundary;

(ii) East and west boundaries - 55 degrees above 3m height with a 7m setback at the boundary; and

(iii) South boundaries - 50 degrees above 3m height with an 8m setback at the boundary.

(c) max. 30m building length (RD13ii A. B.);

(d) 1000m^2 GLFA trigger (RD10a.) – except for Montreal House;

(e) matters of discretion (13.5.5); and

(f) 60% site coverage rules for the former Christchurch Women's Hospital site.

175. I consider that the proposed requirement for a minimum of tree planting of 1 tree per 15 metres along internal boundaries, or part thereof (13.5.4.2.4.e.i.B.) would provide some visual softening of any potentially large-scale buildings.

Site Specific Matters - Former Christchurch Women's Hospital

176. This SPHZ site is located within the four avenues close to the City Centre. It extends across the block from Colombo Street to Durham Street North, and is approximately 22,465m^2 in size. It has been predominantly cleared of buildings and is not currently used for hospital purposes.

177. It has a proposed HRZ with height increased from 20 to 22m permitted (18m with a 2m setback then up to 22m) – approximately 6 storey along the northern boundary, and HRZ 'Central City Residential Precinct' with proposed 39m permitted (36m plus 3m for roof and plant) - approximately 10 storeys) along the southern boundary.

178. This site is a reasonably large site with an adjacent higher HRZ within the City Centre walkable catchment (1.2km). Refer to **Figure 20** below.

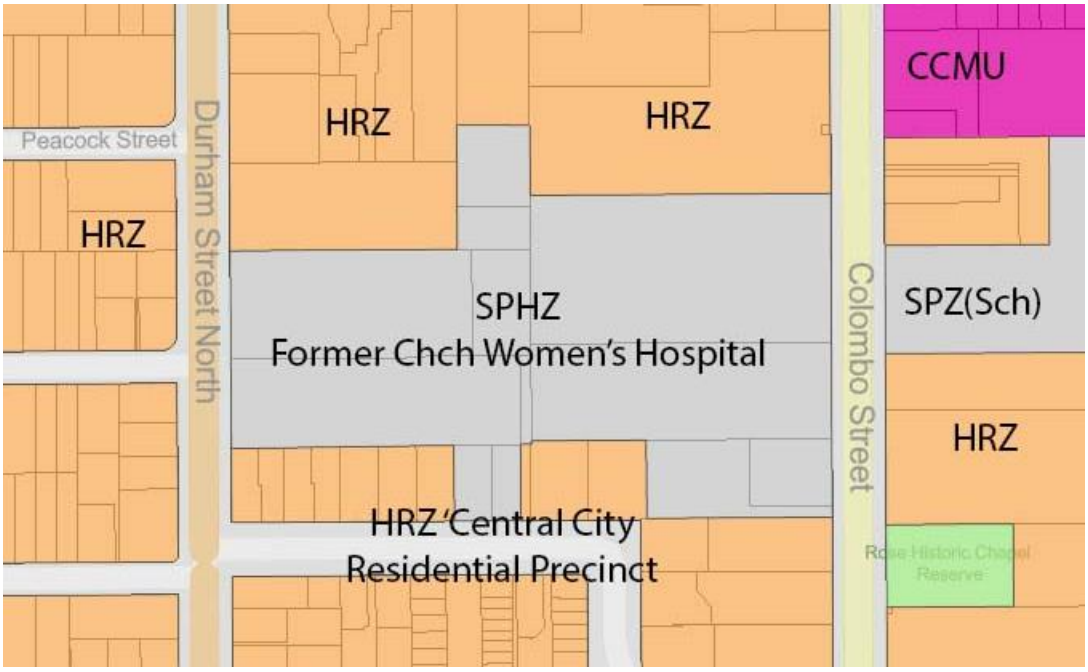


Figure 20 - Former Christchurch Women's Hospital SPHZ and immediate surrounding proposed zones.

179. As with other SPHZ sites, I consider that there is a risk that hospital developments on this site with no maximum site coverage constraints and greater height provisions could result in potentially dominating large buildings being constructed along the internal boundaries. This is particularly the case along the south boundary of this site.

180. Previously in the notified technical report, I also identified three options for further addressing this risk. These were:

(a) Provide a site coverage rule for this SPHZ;

(b) Enable a lower height limit in alignment with the northern HRZ; and

(c) Change the HRZ 'Central City Residential Precinct' boundary line to follow the southern edge of this SPHZ.

181. In the notified PC14, my technical report recommendation was to enable the proposed 20m northern HRZ height. A 60% site coverage rule was included as a preferred option from a planning perspective). Since notification the provisions for this site and the HRZ are proposed to change to:

    (a) Maximum height of 14 metres within 10 metres from internal boundary, and 22 metres thereafter;

    (b) Road boundary setback of 4 metres;

    (c) Internal boundary setback of 4 metres;

    (d) Recession planes to apply at the northern and southern boundaries with HRZ; and

    (e) 60% maximum site coverage.

182. This new package of rules is broadly consistent with my previously recommended provisions in that:

    (a) The 22m height is consistent with the HRZ underlying residential zone and moves the HRZ boundary to the southern side of the site.

    (b) 4m setbacks (with recession plane controls) are proposed which maintains the operative setback of 5m for this site.

183. The main difference is that the 22m height is now proposed to be permitted.

184. I consider that there is still a risk of large buildings adversely impacting on the southern residential boundary of this site, particularly in relation to building dominance and overshading due to a potential lack of breaks in the mass any hospital building(s), particularly along the southern boundary length of approximately 225m.

185. To manage this risk, I support including a site coverage rule (in conjunction with the other triggers for restricted discretionary consent assessments) for this site due to its large size.

186. The following matters are provided in 13.5.5 Rules - Matters of discretion to help response to this issue:

    13.5.5.2 Site and building design a. Whether the development:

iii. In terms of its built form and design, generates visual interest in the street scene and contributes to the amenity values of the surrounding area;

iv. Mitigates the visual impacts resulting from the building scale, form and location in respect to the interfaces with public and private space;

v. Is designed to manage visual bulk by limiting any continuous lengths of buildings and rooflines;

ix. Minimises overshadowing, privacy and building dominance effects on residential neighbours including on habitable rooms or outdoor living spaces, or public spaces;

x. In terms of an increase in building height, increases the bulk and scale of the building such that it results in adverse visual and amenity effects on adjoining residential neighbours and public space;

xi. In terms of an increase in building height, provides modulation or design features of the facades and roof form to reduce their visual impact, e.g. upper floor setbacks above 14 metres, and integration of any rooftop plant and servicing into the roof-form;

187. Part of this SPHZ site (lots on 38 and 40 Gracefield Avenue) extends to the south fronting onto Gracefield Ave. In my opinion, 38 and 40 Gracefield Avenue should adopt the proposed HRZ 'Central City Residential Precinct' provisions. This would integrate future built form on these sites into the surrounding residential context and would impact on neighbouring properties within this zone in a way that is commensurate with the anticipated environmental outcomes of the zone.

Responses to Submissions

188. Submission #61 VNA and #918 G. Banks have raised the following matters relating to the former Christchurch Women's Hospital site.

189. The first matter seeks to add a new Diagram E for this site which matches the current Plan recession planes being current Appendix A4.16.2 Diagram C (varying from 35 to 50 to 55 degrees, commencing 2.3m above the site boundary).

190. I do not agree with these submissions in that the recession planes for this site should be as per the operative Plan (Appendix A4.16.2 Diagram C). In

my opinion, to provide a commensurate design response between zones and to reduce complexity within the Plan, the proposed qualifying matter recession planes should apply to the former Christchurch Women's Hospital site.

191. This submission states that no shading assessment has been undertaken in relation to the Former Christchurch Women's Hospital site and the adjacent proposed HRZ residential zone. The proposed recession plane modelling and analysis of shading effects from the HRZ provisions have been prepared as part of the Residential Chapter qualifying matters recession plane shading diagrams and discussion. As a commensurate response to surrounding residential areas, this analysis and discussion in these Section 32 reports[15] also relates to the SPHZs. In summary, these reports identified that the proposed qualifying matter recessions planes address the southern latitude differences between northern Tier 1 centres and Christchurch City. It is acknowledged that there will be anticipated reduction of sunlight access for HRZs of 22m (was 20m) however achieving approximately a minimum of 2 hours sunlight per day based on the 'Good Solutions Guide for Apartments'[16] document. HRZ to 6/7 storeys is considered to be able to be managed. Above this building height, there is likely to be a greater loss of sunlight access.

192. As discussed previously, the underlying alternate zone for the former Christchurch Women's Hospital is proposed to be HRZ. This has a height of 22m with a site coverage of 50%. The SPHZ is proposed to have the following rules and matters to manage effects of heights.

    (a) 10m internal boundary building setback (13.5.4.2.3b);

    (b) max. 30m building length (RD13ii A. B.);

    (c) 1000m^2 GLFA trigger (RD10a.);

    (d) matters of discretion (13.5.5); and

    (e) 60% site coverage.

193. In my opinion, the proposed measures above would enable the location and design of any future hospital buildings on this site, to be managed in a way

15 Part 2 - Qualifying Matters - Appendix 34 – 'Sunlight Access', and Appendix 35 - Technical Report – 'Residential Recession Planes in Christchurch'. Part 3 - Residential - Appendix 3 Technical Report – 'Urban Design Medium and High Density Residential Zones' (11 August 2022).

16 'Good Solutions Guide for Apartments', Auckland City/North Shore City, ISBN 978-0-473-11999-7

that provides a reasonably commensurate level of shading or daylight access and building dominance effects while also providing for larger buildings that may be required for hospital use.

194. This submission also requests that the former Women's Hospital site have a 20m height limit (and that draft clause 13.5.4.1.3 (b) RD13 (b) (ii) be deleted, which provides that *The maximum height shall be 32 metres at 4 metres from a road boundary or internal boundary*. A 22m permitted is now proposed. Any buildings proposed above this height would require a restricted discretionary resource consent. To some extent I consider that this change of provision helps to address this submission matter.

195. Another request by these submitters is:

> *Amend Policy 13.5.2.1.3 to read: Encourage comprehensive residential development of hospital sites (except Christchurch Hospital and former Christchurch Women's Hospital) that are no longer required for hospital purposes.*

196. If the former Christchurch Women's Hospital is redeveloped for residential use in the future, I consider that, given the large scale of this site, a comprehensive residential development approach to the site would be appropriate. This would enable an integrated design approach to be undertaken that would help to manage any potential adverse effects on surrounding residential areas. I do not support including this site in the exemption to this policy.

Conclusions

197. In conclusion, I consider that the proposed package of provisions provides for simplification and greater consistency of provisions for SPHZs.

198. My main concern is a lack of site coverage provisions on the hospital sites potentially enabling large dominating buildings has been addressed by a package of setback, recession plane and max GFA rule, and matters of discretion.

199. The addition of a site coverage rule for the former Christchurch Women's Hospital is a bespoke response to this site which I consider would address the reduced setback for this SPHZ site.

200. I consider that the proposed commensurate approach would broadly provide for a consistency of built form that is anticipated through the NPS-UD, contribute to creating a coherent urban form, provide enablement for hospital growth, and integrate with the overall strategic direction of the urban form for the city.

Dated: 11 August 2023

William Field

APPENDIX A - CHAPTER 15 – COMMERCIAL, 15.4.2.10, 15.5.2.10, 15.6.2.11, 15.8.2.13, 15.10.2.10, 15.12.2.13 SETBACK FROM CORRIDOR, AND 15.14.5.3 MATTERS OF DISCRETION

15.4.2.10 Minimum road boundary setback

For all properties fronting the City Spine Transport Corridor:

i. Where the road is 24m or less in width, a minimum building setback from road boundary of 1.5m is required; and

ii. Any fencing provided along the road boundary shall not exceed 1m in height maximum.

iii. Any outdoor living space must not be located within 1.5m of the road boundary.

15.14.5.3 City Spine Transport Corridor Matters of Discretion

i. Whether the reduced setback would provide sufficient space in the front yard to contribute positively to street amenity and provide for the planting of medium to large specimen trees.

ii. Whether the reduced setback would promote active engagement with, and contributes to the vibrancy and attractiveness of, any adjacent streets, lanes or public open spaces.

iii. Whether the reduced setback would provide sufficient opportunity to achieve well integrated and multiple land use and infrastructure outcomes, including as a minimum and to achieve best practice guidelines, two traffic lanes, pedestrian, cycle and public transport services; landscape amenity and tree planting; street furniture, stormwater retention and treatment facilities,

iv. Is designed to incorporate Crime Prevention Through Environmental Design (CPTED) principles, including encouraging surveillance, effective lighting, management of public areas, boundary demarcation location of outdoor living space and fencing.

v. Whether buildings enabled through a lesser setback from the road would impede widening of the road reserve through designation and/or land acquisition.

Chapter 14 – Residential, 14.6.2.17 Minimum road boundary setback, 14.5.2.18 Minimum road boundary setback -, and 14.15.1.j Matters of Discretion

For all properties fronting the City Spine Transport Corridor:

i. where the road is 24m or less in width, a minimum building setback from the road boundary of 4m is required; and

ii. any fencing provided along the road boundary shall not exceed 1m in height maximum, except that the maximum height shall be 2 metres if the whole fence or screening structure is at least 75% transparent; and

iii. any outdoor living space must not be located within 1.5m of the road boundary.

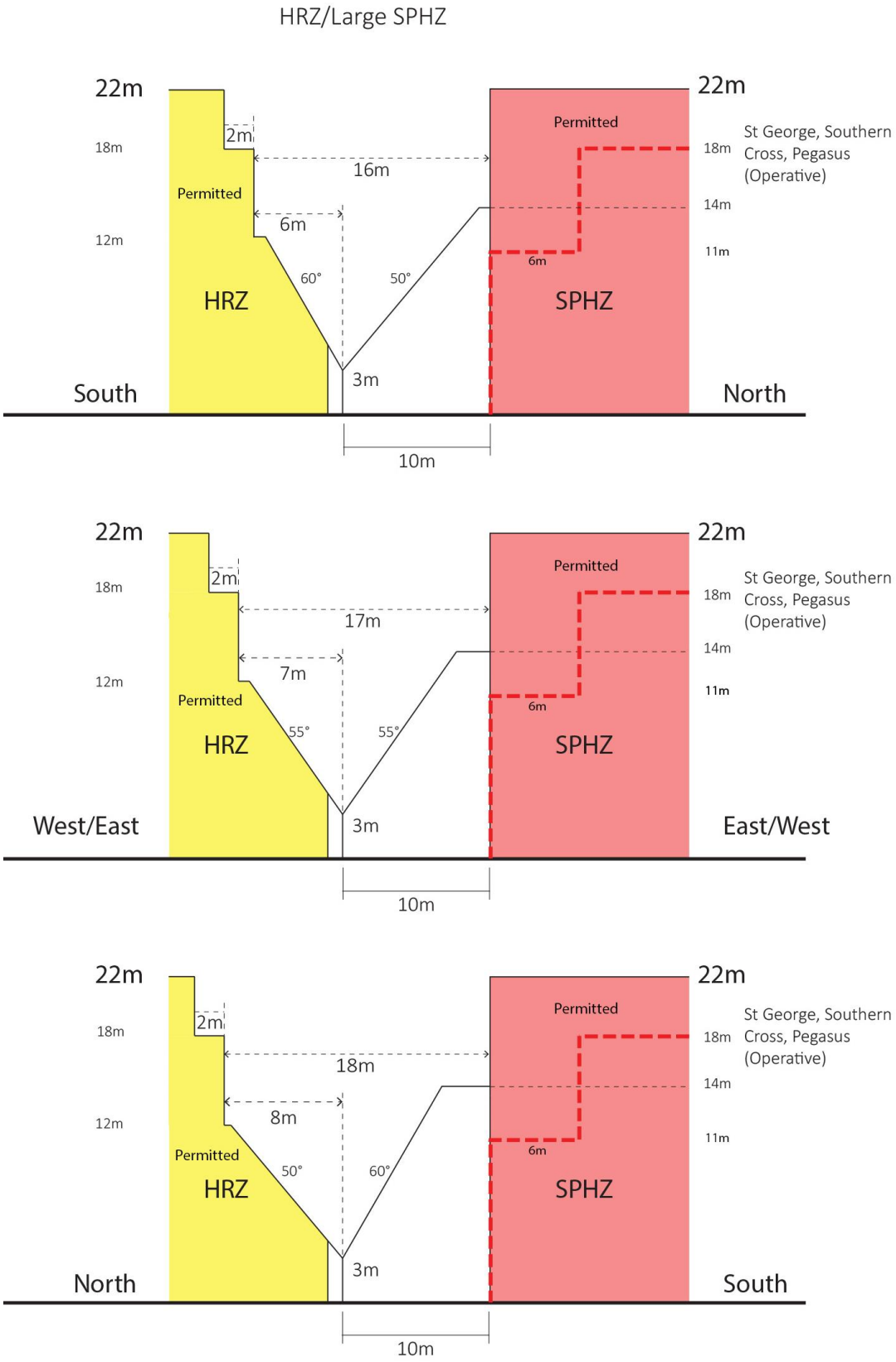
14.15.1.j Matters of Discretion.

i. Whether the reduced setback, location of an outdoor living space and fencing would provide sufficient space in the front yard to contribute positively to street amenity and provide for the planting of medium to large specimen trees.

ii. Whether the reduced setback, location of an outdoor living space and fencing would provide sufficient opportunity to achieve well integrated and multiple land use and infrastructure outcomes, including as a minimum and to achieve best practice guidelines, two traffic lanes, pedestrian, cycle and public transport services; landscape amenity and tree planting; and stormwater retention and treatment facilities, residential street relationships and servicing, and CPTED principles.

iii. Whether buildings, the location of an outdoor living space and fencing enabled through a lesser setback from the road would impede widening of the road reserve through designation and/or land acquisition.

APPENDIX B - LARGE INNER URBAN SITES - PROPOSED HEIGHTS AND RECESSION PLANES



Small Inner Urban Sites - Proposed Heights and Recession Planes