

Strategic Overview and Centre Hierarchy – Planning/ Urban Design

Speaking notes – Jonathan Cleese – for Kāinga Ora

- 1.1. The NPS-UD, the Enabling Act, the CRPS, and the draft Spatial Plan (which is a draft Future Development Strategy) set the strategic framework that PC14 needs to give effect to.
- 1.2. The Enabling Act 'lifts the base' in terms of suburban built form and amenity expectations i.e. MDRS is the normative base outcome, unless QMs are in play. The NPS-UD then provides further direction in terms of where increased density is to be enabled over and above the lifted base.
- 1.3. The NPS-UD is an internally consistent document – implementing the directive Policy 3 is a tool to deliver a well-functioning urban environment – it is not a threat to that outcome.
- 1.4. I will focus on what I see as six key differences between my evidence and that of Council experts.

1) CCZ height limit, activity status, and tower built form rules

- 1.5. The City Centre is rightly the primary focal point for both activity and density. In the City Centre Zone (**CCZ**) no height limit would be the most effective means of maximising capacity, whilst acknowledging that the proposed 90m limit is also enabling (with an RD rather than DIS activity status). I identify that the enablement sought through the height rule is however undermined by the combination of other built form rules that are proposed to apply to tall buildings. Respectfully suggest that the Panel pay particular attention to the effect of the built form package, as the package means that the functional height of buildings is in practice limited to 28m for all but the largest sites. This is particularly an issue for buildings between 28-45m where the proposed built form rules create a lot of cost for little urban form gain.
- 1.6. CCZ height activity status and rules: Appears to be some confusion as to activity status and the overall package. Rule package as recommended by Council is:

| Rule | Urban Design | Built Form | Activity Status/ rule |
|--|--------------|------------|--|
| P18 – ‘Small buildings’ - <21m dimension | X | | Permitted |
| C1 – UD certification | X | | Controlled |
| RD1 – UD non-certified | X | | RD. Extra assessment matters for 28m+ 15.14.2.6(a)(ix) |
| 15.11.2.11(A) - Height 90m+ | | X | D1 |
| 15.11.2.11(B) Building Base 28m+ | | X | D1 |
| 15.11.2.3 – Sunlight to the street | | X | RD5 |
| 15.11.2.12 - Road wall 21m | | X | RD5 |
| 15.11.2.14 – Tower setbacks | | X | RD5 |
| 15.11.2.15 – tower dimension & coverage | | X | RD5 |
| 15.11.2.16 – Tower separation | | X | RD5 |

2) Height limits of the remaining areas within the Four Avenues

- 1.7. For the areas adjacent to the CCZ and inside the Four Avenues, a consistent height limit of 39m (12 stories) should be enabled across the balance of the City Centre (both HRZ and CCMUZ), except where there are clearly identified heritage or character values.

3) Geographic extent and activity mix of MUZ outside the Four Avenues

- 1.8. Immediately beyond the Four Avenues, I support the provision of a High Density Residential Zone (**HRZ**) in a walkable catchment of the CCZ, and agree with the recommended height limit of 22m. I likewise support a 22m height limit being applied to the Mixed Use Zones (**MUZ**) that are proposed outside the Four Avenues.
- 1.9. PC14 includes a significant change in outcome for these MUZ areas from their current industrial character and purpose. In order for such areas to successfully transition to predominantly residential environments, a change in zone needs to be accompanied by focussed place-making initiatives supported with the funding necessary for the acquisition of public open space, laneway connections, and the sorts of facilities that are inherent in good quality residential neighbourhoods. I do not consider the proposed rule package and associated Outline Development Plan to be an effective tool in isolation for delivering the necessary levels of amenity. I therefore recommend that the extent of the MUZ be consolidated around areas of existing amenity, at least in the short-term. I agree with the revised boundary proposed in the urban design Joint Witness Statement (and also referred to in the rebuttal of Nicola Williams and Kirk Lightbody for CCC).

- 1.10. Separate to geographic extent is the issue of activity mix. PC14 in essence proposes an industrial zone with permitted residential activity rather than a truly mixed use neighbourhood. A greater mix of retail, office, and community activities should therefore be enabled, with tenancy caps in place if necessary to manage distribution effects.

4) Metropolitan Centre Zone vrs Town Centre Zone for the big 3 suburban centres

- 1.11. In terms of how suburban commercial centres are treated, the proposed commercial centre hierarchy is both missing a key level that is anticipated in both the NPS-UD and the National Planning Standards and is unduly complicated in terms of multi-level Local Centre and Town centre categories at a policy level.
- 1.12. I recommend that the three large centres of Riccarton, Papanui, and Hornby be zoned as Metropolitan Centres, with an associated 56m height limit applying to the commercial areas. These three centres are the largest suburban centres in the South Island and have a clear sub-regional retail catchment.
- 1.13. As directed by Policy 3(b) and (c) I recommend that the residential areas adjacent to these three centres have a HRZ zoning and a 36m height limit, stepping down to 22m as distance extends from the centre.

5) Geographic extent of HRZ in Riccarton

- 1.14. I recommend an increase in the size of the HRZ in the Riccarton corridor given the excellent proximity of this corridor to centres, University activity hub, open space, and modal choice. I acknowledge that the extent of HRZ for parts of this corridor will turn on the Panel's findings on QMs.

6) Deleting the 'large Local Centre' category as a policy construct

- 1.15. By including these three centres in the MCZ, it enables the Town Centre Zone (TCZ) category to be simplified and expanded to cover the 'large Local Centre' category. I agree with Officers that a 22m height limit is appropriate for the TCZ. I note Mr Lightbody's rebuttal is open to including Merivale, Sydenham and Church Corner in the TCZ, provided doing so would not undermine wider centre hierarchy outcomes.
- 1.16. In short, we have a CCZ at the top of the hierarchy, followed by three MCZs, followed by the TCZ. These three categories of commercial centres are all bounded by HRZ,

with both the heights and the geographic extent of HRZ commensurate with the size of the centre. Medium sized suburban centres (typically supermarket-anchored) have a LCZ and are surrounded by MRZ, with heights again commensurate with the size of the centre. And then finally NCZ is surrounded by MRZ.

- 1.17. Implementing the above urban form outcomes and simplification of the centre hierarchy is delivered through a series of more 'fine-grained' amendments to the policy and rule frameworks for the various commercial zones to ensure that they are effective and efficient in delivering the outcomes discussed above.