

EVIDENCE OF NANCY GOMEZ ON BEHALF OF NANCY GOMEZ & ADAM CROW

[Submitters S160, S160.FS.3 & S221.FS.1]

1. SUMMARY

My name is Nancy Gomez, resident of Paraparaumu Beach. I have a Bachelor's degree in Valuation and Property Management from Lincoln University and a Master's degree in Resource and Environmental Planning from Massey University. I am providing evidence in relation to the submission and further submissions by myself and Adam Crow.

In this evidence I elaborate on my opposition to the spread of intensification and building heights, but particularly the application of policy 3 of the NPS-UD to allow higher intensification within the residential zone (GRZ) and centre zones. In summary I believe KCDC must amend its application of policy 3 of the NPS-UD that necessitates:

- a) Examining evidence from KCDC with regards to existing levels of commercial activity and community services, and how those have influenced the building heights proposed in PC2,
- b) the review of walkable catchments from the edge of metropolitan, town and local centre zones,
- c) the deletion of the areas identified as "Residential Intensification Precinct" around local centre zones,
- d) the reduction of the areas identified as "Residential Intensification Precinct" around town centre zones,
- e) the reduction of the areas identified as "Residential Intensification Precinct" around the metropolitan centre zone,
- f) the lowering of proposed building heights within the metropolitan and town centre zones

2. THE NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT (VERSION MAY 2022) & PLAN CHANGE 2 INTENSIFICATION

This National Policy Statement (NPS-UD) replaces the National Policy Statement on Urban Development Capacity 2016, and this May 2022 version of the NPS-UD incorporates the amendments made by section 77S(1) of the Resource Management Act 1991 (as inserted by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021), to rapidly accelerate the

supply of housing and help to address some of the issues with housing choice and affordability.

As Kapiti Coast District Council (KCDC) is a Tier 1 territorial authority under the NPS-UD, this Plan Change 2 (PC2) is driven by the statutory requirement that the Council prepare and notify an Intensification Planning Instrument (IPI) that incorporates the Medium Density Residential Standards (MDRS) in Schedule 3A of the RMA and gives effect to Policies 3 and 4 of the NPS-UD.

Of relevance is policy 3 of the NPS-UD, which reads:

Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:

- a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and*
- b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and*
- c) building heights of at least 6 storeys within at least a walkable catchment of the following:*
 - i. existing and planned rapid transit stops*
 - ii. the edge of city centre zones*
 - iii. the edge of metropolitan centre zones; and*
- d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.*

3. KCDC APPLICATION OF POLICY 3

According to the Section 32 Report (see section 5.2.4 of that report), the approach taken by KCDC to give effect to policy 3 of the NPS-UD is based on the existing hierarchy of centres zones contained within the District Plan (Metropolitan, Town and Local centres). The centres zones provide for commercial activities (such as shops, offices and other places of employment) and community services (such as healthcare services, libraries and other community facilities) in areas located throughout the District.

A table was provided in the Section 32 Report (shown below) that summarises the level of intensification proposed by PC2, based on the existing centres hierarchy and train stops located within the District. An illustration of how policy 3 have been

interpreted spatially in the Kapiti Coast was prepared by Boffa Miskell (see appendix E of the Section 32 Report).

Proposed building height (up to and including)	Area	Location	NPS-UD policy
Centres Zones			
40 metres (12-storeys)	Metropolitan Centre Zone	Paraparaumu	3(b)
21 metres (6-storeys)	Town Centre Zone	Ōtaki Main Street Ōtaki Railway Waikanae ⁵¹ Paraparaumu Beach Raumati Beach	3(d)
	Mixed Use Zone (Ihakara Street West, Ihahara Street East and Kāpiti Road precincts) Hospital Zone	Within an 800m walkable catchment of the edge of the Metropolitan Centre Zone at Paraparaumu	3(c)(iii)
	Local Centre Zone (at Paekākāriki)	Within an 800m walkable catchment of Paekākāriki Station	3(c)(i)
15 metres (4-storeys)	Local Centre Zone	Waikanae Beach Kena Kena Mazengarb Road Meadows Raumati South	3(d)

General Residential Zone			
20 metres (6-storeys)	Within an 800m walkable catchment of the edge of the Metropolitan Centre Zone	Paraparaumu	3(c)(iii)
	Within an 800m walkable catchment of a rapid transit stop	Waikanae station Paraparaumu station Paekākāriki station	3(c)(i)
14 metres (4-storeys)	Within a 400m walkable catchment of the Town Centre Zone ⁵²	Ōtaki Main Street Ōtaki Railway Paraparaumu Beach Raumati Beach	3(d)
	Within a 200m walkable catchment of the Local Centre Zone ⁵³	Waikanae Beach Kena Kena	3(d)
Proposed building height (up to and including)	Area	Location	NPS-UD policy
		Mazengarb Road Meadows Raumati South	
3-storeys (11m +1m for 50% of a building's roof in elevation where the entire roof slopes 15 degrees or more)	Everywhere else within the General Residential Zone		MDRS ⁵⁴

4. KAPITI BUILT FORM

In Kāpiti Coast a pattern of mainly single detached dwellings with low coverage on individual sites predominate. Further, in the areas closer to the coast, the built form is characterised by a linear layout and low-key beach character¹. In light of the increased level of intensification anticipated by PC2, it is important that any proposed built form is sensitive to its surrounding environment and that integrates well into the existing setting.

Whilst policy 3 gives clear direction on intensification opportunities around the services and amenities provided in the centre zones of the District Plan (Metropolitan, Town and Local centres), by concentrating higher density into smaller walkable catchments surrounding centres zones and train stations is more likely to result in a more sympathetic intensification being realised within the centre zones and the General Residential zone (GRZ).

Policy 3(d) of the NPS-UD requires district plans to enable building heights and densities of urban form be commensurate with the level of commercial activity and community services. Given this and the limited level of commercial activity and community services in the local centres, it is appropriate to concentrate higher density around the metropolitan and town centres while applying the necessary accompanying urban form attributes (i.e., existing lot patterns, building coverage and height) to inform the appropriate building height of new developments and achieve sensitive and appropriate development across the District.

Whilst I acknowledge that it would be inevitable to see higher buildings around Kapiti, there is no clear reasoning (neither in the Te tupu pai - Growing well nor in the Section 32 Report) about the choice of building height of up to 12 storeys (40m) in some areas of the District, or the approach taken to choose building heights are commensurate with the level of commercial activity and commercial services available in the centre zones.

¹See:https://www.kapiticoast.govt.nz/media/ox2jcsx5/pc2_s32_appendixh_characterassessmenttraumatibeach.pdf
https://www.kapiticoast.govt.nz/media/inupdttn/pc2_s32_appendixi_characterassessmentwaikanaeach.pdf

I do question whether further/appropriate investigations of the level of commercial activity and community services in centre zones was undertaken to establish whether the proposed building heights of urban form provided for in PC2 are commensurate with the level of commercial activity and community services in the centre zones of the District.

5. AMENDING THE APPLICATION OF POLICY 3

In my draft PC2 feedback² and submission, I requested the review of the building heights around local centres based on the lack and/or limited commercial activities and requested lower building heights based on the small geographic size and beach village character in Kapiti. Given these and having considered other submissions, I believe that the application of policy 3 should be done differently, to avoid significant changes to Kapiti built form and to avoid disperse urban form in suburban/beach areas while giving effect to policy 3.

Taking into consideration the existing built form of the District and that policy 3(b) requires building heights of at least 6 storeys, PC2 proposing up to 12 storeys high buildings within the Metropolitan Centre zone (i.e. Paraparaumu centre) doesn't seem to be justifiable. However, given that the Metropolitan zone is the core/focal point of Kapiti, the highest buildings should be within this zone but to a height up to 7 storeys to achieve efficient integration with the existing urban form and sense of place, whilst given effect to policy 3(b).

In terms of policy 3(c)(i), I consider this policy was appropriately applied. This means that buildings up to 6 storey within the 800m walkable catchment (i.e. 10min walk) of the train stations at Paekākāriki, Paraparaumu, regardless of the zoning, should be kept in PC2.

In terms of policy 3(c)(iii), the 800m walkable catchment from the edge of the Metropolitan zone (which is predominantly residential) should be reduced to 400m. This reduction is necessary to concentrate up to 6 storey high buildings closer to the Metropolitan zone and avoid isolated developments on the other side of Kapiti Expressway that are not compatible and/or complementary with the existing built

² See Ref.81

https://www.kapiticoast.govt.nz/media/04bbdt13/pc2_s32_appendixb_draftpc2feedback.pdf

form around Milne Drive and around Kiwi Road. Therefore, a height of up to 6 storeys within a 400m walkable catchment from edge of the Metropolitan zone is more appropriate for the surrounding residential area and to give effect to policy 3(c)(iii).

Town centres service a 'niche' destination retail market, as well as a range of other business, and some community and civic activities. For these town centres, policy 3(d) doesn't prescribe building heights but leaves it to Councils discretion to decide building heights are commensurate with the level of commercial activity and community services in those town centres. Town centre zones are located in:

- **Raumati Beach** (around Raumati Road & Matatua Road),
- **Paraparaumu Beach** (around Marine Parade & Seaview Road and 380-386 Kapiti Road),
- **Waikanae** (around Ngaio Road & Elizabeth Street),
- **Otaki** (Main Highway/Old SH1 and Main Street).

As mentioned earlier in section 4 above, it is appropriate to concentrate higher density around the metropolitan and town centres while applying the necessary accompanying urban form attributes (i.e., existing lot patterns, building coverage and height) to inform the appropriate building height of new developments and achieve sensitive and appropriate development. However, buildings within the town centre zone should be of a lesser height than buildings within the Metropolitan centre, to a height up to 5 storeys (instead of 6 storeys) to reflect the existing hierarchy of centres zones and to achieve efficient integration with the existing urban form and sense of place, whilst given effect to policy 3(d). Further, a height of up to 4 storeys within a 200m walkable catchment from edge of the Town centre zone is more appropriate for the surrounding residential area and to give effect to policy 3(d).

Local centres are characterised for having a mix of limited local retail activities, other business activities, facilities and services which serve the daily convenience needs of local communities. There are areas zoned local centre:

- **Raumati South** (beach end of Poplar Ave) – two cafes, a takeaway shop and a Four Square
- **Kenakena** (Donovan Rd & Te Kupe Rd) – a bakery, a bottle store, a café, a dairy and a Four Square
- **Mazengarb Road** (The Jolly Pub) – a pub and a pie kiosk.

- **Meadows** (Connect Church on Mazengarb Road) – a church, a coffee cart and dentist.
- **Waikanae Beach** (Ono St & Rangihiroa St) – a dairy, a bakery and a takeaway shop
- **Paekākāriki** - the local centre at Paekākāriki is excluded from further discussion, since its intensification is already covered by the walkable catchment of Paekākāriki station.

Apart from maybe Kenakena and a distant maybe Raumati South that have a Four Square each, realistically there are no retail activities and no community activities in the other three local centres (except for a church) that serve the daily convenience needs of the area. Whilst I acknowledge that buildings within the local centre zones can already go up to 4 storeys and I agree to keep it up to 4 storeys as per PC2, but the very low level commercial and community activities in local centres do not justify up to 4 storey buildings within a 200m walkable catchment and higher intensification around the local centre zones should be removed. Alternatively, the reduction of the walkable catchment from 200m to 100m, if there must be higher building heights around local centres..

It is noted that half of the 200m walkable catchment from Kenakena falls within Te Atiawa Park and Kenakena School grounds, a school which is zoned residential but subject to a designation (MEDU-011)³. Therefore, higher intensification on one side of the Kenakena local centre is unrealistic.

Also, higher intensification around a church and a pub (existing lawful activities) has the potential for reverse sensitivity effects. The proposed higher density residential activities will be sensitive to effects such as lighting, hours of operation and noise generated by the church and the pub, and could result in an environment that is not pleasant for people to live in. It is also noted that Meadows is subject to a design guidelines that has its own building height

³ See Page 19:

https://www.kapiticoast.govt.nz/media/wnic5k0t/pc2_s32_appendix_spatialapplicationpolicy_3.pdf

restrictions. Therefore, higher intensification in this area may conflict with the Meadows Precinct Design Guidelines⁴.

Given the points raised in this section 5, I seek substantial changes to building heights in PC2 that would be commensurate to existing levels of commercial activity and community services in the centre zones and that should be dictated by current/historical building heights and densities.



Figure 1 - Mazengarb Road Local Centre (The Jolly Pub) – March 2023

6. RELIEF SOUGHT

The revised application of policy 3, amendment of building heights proposed by PC2 as shown in the table below, and such further or other consequential relief as required to give effect to that table.

⁴ See policy DEV2-P15 and guidelines:
<https://www.kapiticoast.govt.nz/media/xtlhvp3u/appendix-62-meadows-precinct-design-guidelines-updated-may-2019.pdf>

Proposed building heights (up to)	Area	Location	NPS-UD Policy
Centre Zones			
7-storeys	Metropolitan centre	Paraparaumu	3(b)
5-storeys	Town centre	Ōtaki Main Street, Ōtaki Railway, Waikanae, Paraparaumu Beach, Raumati Beach	3(d)
	Mixed use Hospital zone	Within an 400m walkable catchment of the edge of the Metropolitan Centre Zone at Paraparaumu	3(c)(iii)
	Local centre at Paekākāriki	Within an 800m walkable catchment of Paekākāriki Station	3(c)(i)
4-storeys	Local centre	Waikanae Beach, Kena Kena, Mazengarb Road, Meadows, Raumati South	3(d)
General Residential Zone			
6-storeys	Within an 400m walkable catchment of the edge of the Metropolitan Centre	Paraparaumu	3(c)(iii)
	Within an 800m walkable catchment of a rapid transit stop	Waikanae station Paraparaumu station Paekākāriki station	3(c)(i)
4-storeys	Within a 200m walkable catchment of the Town Centre	Ōtaki Main Street, Ōtaki Railway, Paraparaumu Beach, Raumati Beach	3(d)
	Within a 100m walkable catchment of the Local Centre	Waikanae Beach, Kena Kena, Mazengarb Road, Meadows, Raumati South	3(d)
3-storeys	Everywhere else within the General Residential Zone		MDRS