

**From:** Amos Mann  
**To:** Mailbox - District Planning  
**Subject:** Proposed District Plan submission  
**Date:** Sunday, 11 September 2022 12:26:19 pm

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**Proposed District Plan submission of:**

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I declare no advantage to be gained in trade or investment.

I do not want to heard at a submission hearings.

**District Plan Submission**

The District Plan must empower the development of a wide range of diverse and varied housing types in all residential zones, including Papakāinga and Co-housing.

More then ever before we need to re-invent how we house ourselves. We are in an exciting transformative time discovering what works best for our people, our well-being, our climate, our environment, and our wealth as we go.

We cannot know exactly what flavour of new housing approaches will come to the fore over this period of change, but we do know that what we have now isn't working for 90% of our community members throughout the majority of their lives.

At this time, our community members have a wide and expanding range of needs across their life-stories: from childhood, to teenage-hood, to student-hood, to adult-hood, and into old age and retirement, we each have a tremendous range of different community needs, environment needs, transportation needs, well being needs, and wealth creation needs. Housing solutions that are flexible enough to meet these needs look nothing like those from over the past 50 years.

We must not continue to work harder and harder to try and meet the needs of only a very few people and only for a relatively short period of their lives. We must be accountable to the diverse and many throughout their life-stories.

We need the District Plan to support the change that is happening now, to be flexible and open enough to promote the change that we are faced with - it's no longer a choice whether our housing will change, it must change and it will change.

Therefore, in regards the District Plan, leadership is needed, and therefore, broadly I support and request:

- Accessibility and Universal Design requirements in the Design Guides and in incentives.
- Easier consenting and incentives for accessible and eco-friendly developments
- Providing incentives for lifts in multi-storey developments
- Working with central government to improve accessibility and building performance requirements in the Building Code.
- Prioritising emissions reduction, better quality of life, and community cohesion and resilience.
- Work closely with Waka Kotahi to make a more liveability-focused and climate-focused road and street network, especially where intensification is happening.
- Multifunctional community spaces within centres as Climate Action Hubs to support the circular economy, provide space for innovation, education and behaviour change and create a tangible vision of a low carbon future.
- Circular economy principles being integrated into the district plan so that waste is minimised and designed out of construction projects, and that resource recovery infrastructure is put in place to manage any remaining waste.
- Green spaces that are recreational, food producing, and support biodiversity. Community gardens and green stormwater infrastructure should maximise their value across all these outcomes and the District Plan should support the creation of a sustainable and resilient local food and biodiversity network system.
- The new bicycle and micro-mobility device parking requirements for commercial and community facilities in the Centres and Mixed Use zones.
- Centering Tangata Whenua and placing Te Tiriti at the core of planning.

And specifically:

**Medium density residential zones**

I support larger walking catchments for intensification around centres and mass transit hubs.

Where building height limits and recession planes and setbacks are mentioned, I want to see these made universally consistent with the Coalition for More Homes' Alternative MDRS.

Please add a permeability standard, such as that minimum 30-40% of sites should be permeable (incl permeable pavers / gravel etc).

I support the Coalition for More Homes' Alternative MDRS recommendations for outdoor living space and green space and suggest these are added.

[https://img.scoop.co.nz/media/pdfs/2111/12\\_11\\_2021\\_The\\_Coalition\\_for\\_More\\_Homes\\_Alternative\\_Medium\\_Density\\_Residential\\_Standards.pdf](https://img.scoop.co.nz/media/pdfs/2111/12_11_2021_The_Coalition_for_More_Homes_Alternative_Medium_Density_Residential_Standards.pdf)

Small-scale commercial activity should be controlled or permitted or restricted discretionary, rather than the proposed discretionary.

The scale of commercial activities that are permitted in these zones should be increased where it's activities that involve people spending time together, such as daycares.

We need to enable larger, more comprehensive developments in our centres, so I wish to see height limits increased in the 15-minute walking catchments to rail stations.

**High density zones**

I wish to see a standard added, requiring that developments adequately accommodate active travel as the building users' first-best choice for accessing it, with universal accessibility as a non-negotiable.

I want to see the zone more enabling of small-scale public-facing commercial activities.

I support larger walking catchments for intensification around centres and mass transit hubs.

### **Co-housing, Tiny housing, Papakāinga**

The District Plan has a tremendous causal effect on housing affordability and housing/transport economics. Increasingly, in large part to combat housing/transport affordability barriers, we are seeing larger number of people turn to alternative housing solutions that include co-housing, tiny-housing, long-term flatting and group-purchasing, and Papakāinga.

These alternatives are not only excellent viable solutions to housing affordability barriers, but also, if well planned for by council, are solutions to reducing the climate change and environmental impacts of single family traditional housing because these alternatives can use much less land per occupant and less building materials per occupant.

In addition, well-planned co-living is a viable solution for increasing social-cohesion, with residences providing multi-generational support networks for each other in good times, and providing vital care at times of natural disaster and emergency.

Tiny-housing also has a resiliency advantage over single dwelling permanent housing, in that a tiny-housing community can relocate relatively easily as climate change impacts increase.

However, to realise these benefits, and plan inclusively for a greater diversity of housing solutions, the District Plan must support a diverse range of housing alternatives more fully with specific planning that incentivises and attracts co-housing, tiny-housing, and Papakāinga projects.

### **Transport**

Universal accessibility, and active and sustainable travel must be prioritised for access to public transport so that people don't need to drive to stations, nor traverse inhospitable park-and-rides once they get there.

### **Council teams**

These teams need proper resourcing, otherwise any the good changes to the District Plan won't be able to be put into practice. I support more rates being used for resourcing these teams.

I also support combined / pooled resources for consenting, design review, and other permitting functions, that mean multiple small councils can enjoy high-calibre expertise and economies of scale.

Ngā mihi nui,

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THE COALITION FOR  
**MORE  
HOMES**

**Alternative Medium  
Density Residential  
Standards**

**NOVEMBER 2021**



## WHO WE ARE

The Coalition for More Homes was brought together in 2016, asking Councillors to pass the Auckland Unitary Plan. We have reignited the Coalition for 2021 and beyond, to advocate for the implementation of the National Policy Statement on Urban Development (NPS-UD) in Auckland.

The NPS-UD is an opportunity to increase the supply of homes close to local centres, amenities, jobs and rapid transit routes. This is an opportunity to form a broader coalition - a Coalition for More Homes

Core team members (not aligned to an organisation) are passionate about cities, housing and transport, making cities more equitable, sustainable and better for everyone now and into the future. The Coalition includes peak body organisations, social welfare organisations, developers, industry leaders and housing advocates.

**MORE HOMES**.NZ

## Introduction

We acknowledge the bipartisan drafting of the Bill, something rarely done in Parliament. This is a strong acknowledgment of the seriousness of New Zealand's housing crisis.

We strongly support the intent of the Medium Density Residential Standards (MDRS), enabling three storeys everywhere allows for the full scale of housing typologies from stand-alone homes to terraced houses to three storey apartments, to be built in all neighbourhoods to meet different demands.

However, most of New Zealand's experience with suburban medium density housing to date has been with 'sausage flat' and 'infill'. However, these typologies often have issues with privacy, private space, and sunlight access. The MDRS is likely to exacerbate these issues.

We are proposing a number of changes to make them even more effective at enabling quality development. The aim of our alternative standards is to **incentivise development which will deliver better design outcomes** for outlook spaces, privacy and sunlight access.

These were developed in consultation with a number of architects and urban designers who work regularly with developers building medium density urban developments.

Like villas of the 1800s, bungalows of the early 1900s, or the state houses of the 1940s, these rules will shape the built form of our cities for generations to come. Getting them right isn't only important to make them politically resilient today, but to make sure they're built for our needs tomorrow.

## The challenge of intensification

In most cities in New Zealand, we have quite long and narrow sites, which are challenging to intensify while delivering good design.

Suburban planning zones have rules that stop building close to the boundaries of the site. These are:

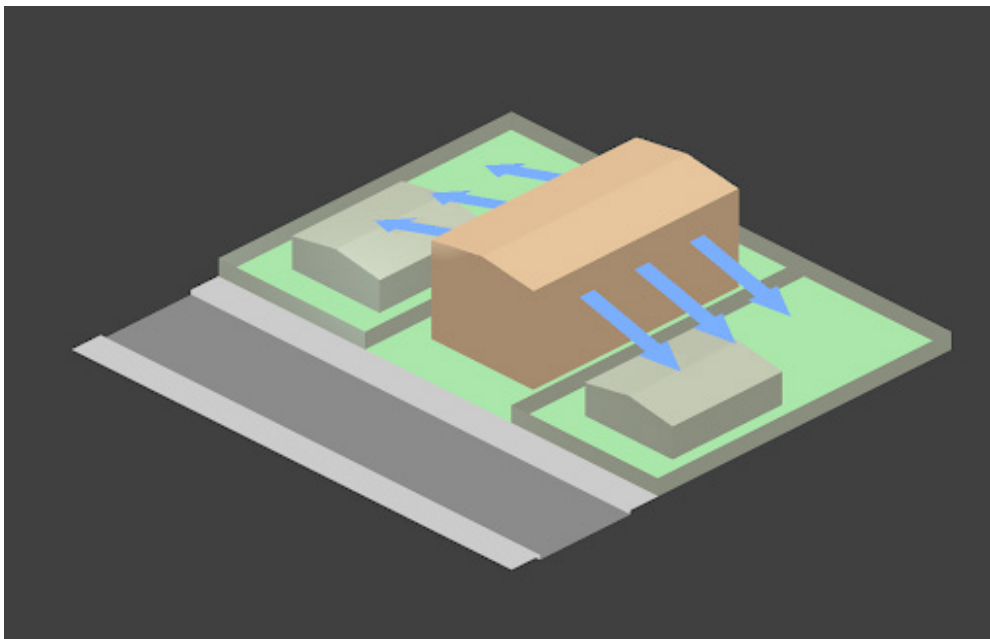
- *Height in Relation to Boundary* (HIRTB) where you have a recession plane from the boundary which the building must sit within.
- *Setbacks or yard requirements* which mean no part of the building can sit within x metres of the boundary.

### ‘Sausage flats’

These rules mean that on narrow sites, developers trying to build multi-unit housing, are forced to flip created housing oriented along the depth of the site, with shared walls like width-wise cuts of a sausage.

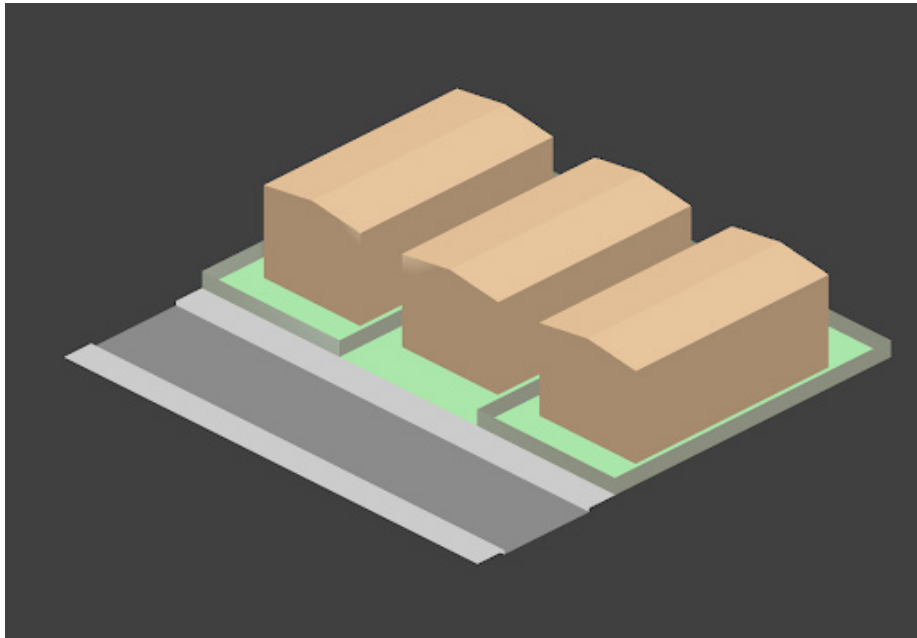
As the walls are parallel to the street front, this necessitates windows primarily overlooking neighbouring properties. In this way, planning rules which attempt to mitigate the issues with new developments, have the unintended consequence of actually exacerbating them.

The alternative MDRS standards will make it easier to achieve 3 storeys on most sites and this is great for enabling more homes. However, they will exacerbate these issues by allowing the development of three storeys closer to, but still not at the boundar.



*A “sausage flat” filling the planning envelope by the MDRS on a 20m x 40m site.*

The placement of the building within the site also serves its residents poorly, a sausage flat leaves 4 thin strips of outdoor space, too small to be useful for anything. As a neighbourhood gets built out in this style, they're likely to leave each other in semi-permanent shade.



*As neighbouring sites have “sausage flats” built the issues are exacerbated*

This will ultimately reduce the number of additional dwellings enabled by MDRS, as the risk of having your view and sun built-out makes medium density living less appealing, especially to families looking to put down long-term roots in a community.

We want to incentivise good design outcomes by introducing standards that enable medium density while encouraging development that minimises those poor outcomes.

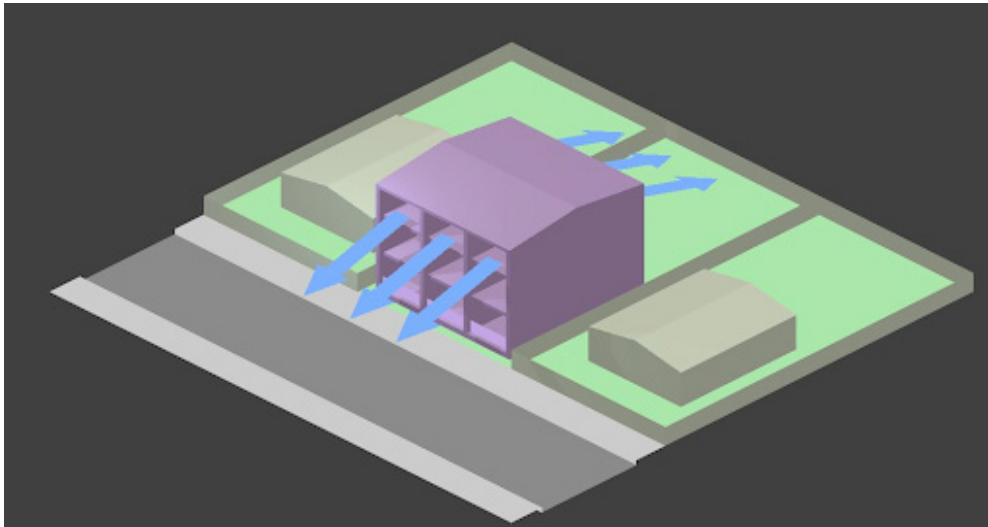


*‘Sausage flats’ in Royal Oak, Auckland*



### Perimeter blocks

By removing the HIRTB and yard requirements **at the front of the site**, we can bring development right up to the front and side boundaries of the property. This means windows and balconies can become oriented towards the street and back, and all the open space gets unified as a single, large backyard.

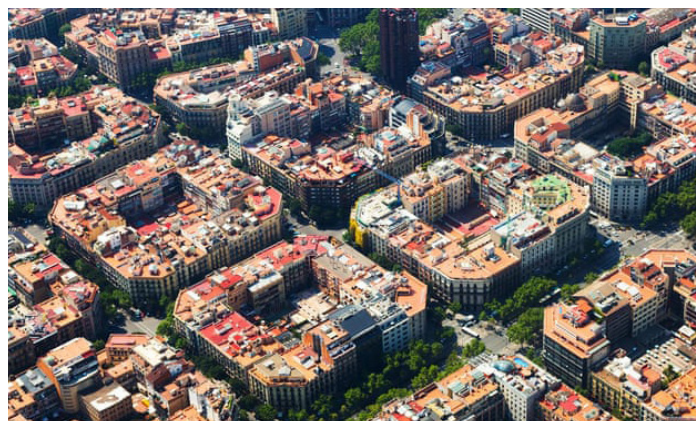


*The style of development incentivised by our standards.*

When multiple neighbouring sites are developed in this manner, you get a *perimeter block*, the common typology in most European cities.

With visibility towards the street and backyard, there's no risk of peering into others' living rooms. The outlook towards the street in fact brings a benefit: a phenomenon identified by famous urban planning advocate Jane Jacobs as "[eyes on the street](#)", which is thought to make neighbourhoods safer and build stronger community ties.

Unlike the 'sausage flat' typology, the perimeter block housing typology can readily be built side-by-side without imposing any issues upon each other. There is never any risk of being built out as both outlooks (the street and backyard) are inherently protected. A direct neighbour building taller will have a negligible effect on access to sunlight.



*Perimeter blocks in Eixample, Barcelona.  
Image source: Alamy*



## Our alternative Medium Density Residential Standards

Our recommended standards (see Table 1) aim to incentivise development at the front of the site. As our cities slowly develop over time, we will work towards creating perimeter blocks. In the process, strengthening street activation, safety and privacy and efficiently using site area through development.

To do this, our standards enable higher density in the first 20 metres of the site, by removing side yard and recession planes. This means developers seeking to maximise floor space and units on the site, will put all or most of the development in this space and less towards the back of the site where we see issues with daylight, privacy and private space predominantly arise.

Other benefits of this include:

- Encourages development to front the street ensuring better oversight
- Keeps more open space and lower density

Beyond the first 20 metres, we propose keeping the side yard and recession planes of the existing three storey zone in Auckland (Mixed Housing Urban). This requires development to be set back further from the boundary and means three storeys will not be able to be achieved unless it is a particularly wide site, in which design issues can be better addressed.

Our standards still allow for 'traditional infill' of a low number of new units at the rear of sites but with restrictions in place to ensure privacy and quality outcomes. Low levels of infill development at the rear of sites can have a role in addressing the housing crisis. For example, an additional house or granny flat, particularly on larger sections. However, higher quantities and densities will lead to negative outcomes

## Our other standards

Going beyond the focus on built form outlook and privacy. We have a number of other standards designed to ensure good outcomes in urban redevelopment.

### Outdoor Living Space

Currently, the MDRS standards a minimum outdoor living space, which is great but can be improved by having it scale in proportion to the unit size. This means a large standalone or terraced house would require a larger outdoor space, while smaller townhouses and in particular apartments can be allowed something smaller.

### Ensuring Green Space

Currently, the MDRS standards do not include any measure that ensures a level of green space or amenity. The standards rely on a 60% maximum impervious surface to try and achieve this. However, there are many ways developments can have impervious surfaces for car parking and outdoor spaces which sit outside this standard.

Our standards include options. This recognises that sites differ and some approaches would not work well on irregular shaped site and can work differently with different typologies and development styles.

The options, which developments must meet at least one of, are:

- **Minimum of 35% landscaped area**
- **1 tree per unit with a 3m x 3m unobstructed area** to allow the tree to achieve maturity. If the development keeps an existing mature tree within the design then this can be traded in place of a tree required under this standard.
- **A 6 metre setback from the rear boundary.** If multiple neighbouring developments choose this option, it will create a core open space running through the centre of the street block between sites, further improving privacy outcomes.

**Table 1: Alternative Medium Density Residential Standards**

Standard	Medium Density Residential Standards	THE COALITION FOR <b>MORE HOMES</b>
<b>Dwellings Permitted (Max)</b>	<ul style="list-style-type: none"> <li>• Three (Permitted)</li> </ul>	<ul style="list-style-type: none"> <li>• 5 Permitted</li> <li>• 6 or more Restricted Discretionary</li> </ul>
<b>Maximum Height</b>	11m + 1m	11m + 1m
<b>Height in Relation to Boundary</b>	6m high at site boundary + 60°	<ul style="list-style-type: none"> <li>• First 20m from frontage: N/A</li> <li>• Beyond 20m from frontage: 3m high at site boundary + 45°</li> </ul>
<b>Setbacks (Minimum Depth)</b>	<ul style="list-style-type: none"> <li>• 2.5m of the front yard boundary</li> <li>• 1m of the side yard boundaries</li> <li>• 1m of the rear boundary</li> </ul>	<ul style="list-style-type: none"> <li>• 0m of the front yard boundary</li> <li>• 0m of the side yard boundaries within 20m of the front boundary</li> <li>• 1m of the side yard boundary beyond 20m of the front boundary</li> <li>• 1m of the rear boundary</li> </ul>
<b>Building Coverage (Maximum)</b>	50% coverage of the site	50% coverage of the site
<b>Impervious Surface (Maximum)</b>	60% coverage of the site	60% coverage of the site

**Table 1: Alternative Medium Density Residential Standards (Continued)**

Standard	Medium Density Residential Standards	THE COALITION FOR <b>MORE HOMES</b>
<b>Outdoor living space (min)</b> <b>(d) – dimension</b> <b>(GF) – ground floor</b> <b>(UF) upper floor</b>	<ul style="list-style-type: none"> <li>• 15m<sup>2</sup> for house at ground floor, with a minimum dimension of 3m</li> <li>• 8m<sup>2</sup> for houses with no ground floor per floor, with a minimum dimension of 1.8m</li> </ul>	<ul style="list-style-type: none"> <li>• 20% of the unit size for house at ground floor, with a minimum dimension of 3m</li> <li>• 15% for houses with no ground floor per floor, with a minimum dimension of 1.8m</li> </ul>
<b>Outlook space (per unit)</b>	<ul style="list-style-type: none"> <li>• 3m x 3m space from the principal living room</li> <li>• From all other habitable rooms: 1m x 1m</li> </ul>	<ul style="list-style-type: none"> <li>• 36 x 4m space from the principal living room</li> <li>• From all other habitable rooms: 1m x 1m</li> </ul>
<b>Green Space</b>	N/A	<ul style="list-style-type: none"> <li>• One of the following</li> <li>• Minimum of 35% landscaped area</li> <li>• 1 tree per unit with a 3m x 3m unobstructed area to allow the tree to achieve maturity. If the development keeps an existing mature tree within the design then this can be traded in place of a tree required under this standard.</li> <li>• A 6 metre setback from the rear boundary. If multiple neighbouring developments choose this option, it will create a core open space running through the centre of the street block between sites, further improving privacy outcomes.</li> </ul>