

To Gina Sweetman
From Deyana Popova / Consultant Urban Designer
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Subject Review of Urban Design Effects for the Proposed Private Plan Change Request (PPC4) by Welhom Developments Ltd to rezone the site at 65 and 73 Ratanui Road from Rural Lifestyle to General Residential Zone

Date 24 October 2025

1. INTRODUCTION

1. I have been engaged by the Kapiti Coast District Council (KCDC) to review the urban design aspects/effects of the proposed Private Plan Change (PPC) by Welhom Developments Ltd. The PPC seeks to rezone the site at 65 and 73 Ratanui Road (the Site) from Rural Lifestyle Zone (RLZ) to General Residential Zone (GRZ). The Site, which is approximately 12.7ha, is currently used for light agricultural grazing.
2. The proposed Plan Change involves:
 - Rezoning the Site from its current RLZ to GRZ to provide for residential development, including the potential for a retirement village.
 - Adding a new Development Area to the District Plan supported by: (a) a Development Area Structure Plan; and (b) site-specific policies and rules in the Development Area, requiring retirement villages or residential activity to be undertaken in general accordance with the Structure Plan.
3. The scope of my review is limited to the urban design effects and, where relevant, to visual effects arising from the PPC. The purpose of this review is to:
 - Identify the key urban design effects arising from the rezoning; and
 - Establish whether the identified effects can be adequately mitigated by existing District Plan provisions and the proposed changes to the District Plan (and the resultant assessment framework).

4. The review is based on a site visit (16 December 2024) and the information provided in the Request including:
 - Welhom Developments Ltd - Private Plan Change Request - February 2025;
 - Landscape Effects Assessment (LEA) (27 November 2024, prepared by Boffa Miskell)/Appendix D;
 - Review of the District Plan General Residential Zone provisions;
 - Review of existing Structure Plans included in the District Plan (to inform my understanding of the different approaches taken to the formulation and detail included in approved Structure Plans);
 - Further information by the Applicant in response to issues raised in the Council sec 92 request, including a planning response, landscape response by Boffa Miskell (13 February 2025) and a revised Appendix A: site-specific provisions and Structure Plan (25 February 2025); and
 - Final notification (Plan Change) document (February 2025).

I have had discussions with the relevant advisors to identify the relationship/overlap between urban design and landscape effects and their relationship to planning matters.

2. SITE & EXISTING ENVIRONMENT

5. The LEA assessment provides a detailed description of the Site and its surrounding environment, which I generally agree with and adopt for this review. Here I only note some of the Site's characteristics that are relevant to the urban design review.
6. An aspect of the site that is pertinent from an urban design/public amenity perspective is the Site's 'external/public' boundary along Ratanui Road. Located very close to the GRZ on the western side, the road frontage of the Site is nevertheless separated from it and positioned along a section of Ratanui Road that is defined on either side by rural lifestyle development and generally characterised by vegetated road boundaries.
7. The treatment of the road/'public' interface of the rezoned Site (in terms of landscaping and building setback) is as important as the 'private' residential interface treatment along the Site's internal boundaries, albeit for slightly different reasons such as integration to existing street/neighborhood character. I note that the proposed site-specific provisions under the PPC do not refer to the road interface treatment (see comments under paragraph 42).
8. The irregular shape of the Site at its southern end creates multiple complex interfaces where some of the adjacent properties have more than one shared boundary with the Site. This creates a level of complexity in addressing the shared boundary treatment of the entire site.

3. URBAN DESIGN/LANDSCAPE & VISUAL EFFECTS: OVERVIEW

Urban Design Effects Overview

9. Urban design effects overlap to some degree with landscape effects and are closely linked to visual effects. I assume that this is reason for the Applicant not to provide a separate urban design effects assessment but integrate it in a more general way into the LEA assessment.
10. At a Plan Change level urban design effects are focused on the extent to which new development integrates into the site, its immediate context and the wider setting.
11. In the context of the PPC, urban design effects are influenced by the way new development (residential or retirement village) will relate to and integrate with:
 - a. the Site and its valued characteristics, with special reference to landform and ecological features (key issues: roading and open space layout and building scale and location in relation to notable landform and ecological features; and/or features that contribute to the character of the site);
 - b. Ratanui Road and the immediately adjacent properties, most of which have a rural lifestyle zoning (key issues: boundary setbacks and boundary landscape treatment, including treatment of any level changes, relationship to neighbourhood character); and
 - c. the wider setting of the rural lifestyle zoned land which surrounds most of the site's perimeter (key issues: impact on visual amenity/visual experience in public and private views, connectivity).
12. Under the PPC the potential urban design effects will need to be considered in the context of the proposed higher density environment of up to 153 lots/235 dwellings (up to 11m tall) compared to a much lower anticipated density development of 12 dwellings and 12 minor dwellings (with max height of 8m) under the current zone provisions.

Landscape and Visual Effects in relation to potential urban design effects: Overview

Landscape Effects Assessment

13. The LEA supporting the PPC considers that the change in zoning to General Residential is suitable due to the location of the Site on the edge of existing residential areas. I note however that the Site is surrounded largely by rural lifestyle zoning, except for the northernmost section of its western boundary which abuts the GRZ (approximately 160m of the approximately 617m long western boundary). In terms of its wider context, the Site forms part of a larger area with a rural lifestyle zoning that is located to the east of Otaihangā Road

and stretching on either side of Ratanui Road. In this sense, the Site's context is primarily rural lifestyle, although its road end is located close to the GRZ (approximately 64m away from it). On the western side, the Site is separated from the GRZ by a maximum distance of 290m.

14. The LEA (p.2) notes that the assessment of landscape and visual effects and associated provisions provided under the PPC has considered the difference between what could be developed under the current zoning and the potential development under the PPC of up to 153 lots/235 dwellings and *'associated ancillary infrastructure such as landscaping and a new road network as a result of the proposed plan change'*.
15. The LEA identifies change in landscape character (resulting from changes in topography, loss of planting) and potential effects on visual amenity as key issues and considers they can be suitably mitigated through the Structure Plan and proposed site-specific provisions included in Appendix A.
16. In my opinion, however, further amendments to those already made as part of the sec 92 request are required to Appendix A to achieve the envisaged outcome (these are discussed in Section 6 of my review).

Changes to the landform

17. During the site visit some of the most pronounced dune forms became evident. Informal conversations with the Applicant's advisors during the site visit suggested that the Applicant intends to retain some of the most pronounced dune forms, such as the notable high dune at the northern end of the Site and integrate them into the layout of future development. However, the Structure Plan Diagram (Fig 1) does not record that intention. While I accept that the subject high dune forms might not have high landscape value, they are nevertheless a characteristic feature of the Site and incorporating any such features into the site planning is a 'best practice' approach that will strengthen both the integration of the development to the Site as well as enhance its identity - an outcome that is desirable from both landscape and urban design effects perspectives.
18. I also note that the Council's Landscape Review (para 19) considers that the high dune straddling the northern boundary (the northern dune) *'appears to be unmodified and part of the larger dune system that could be retained'*. A relevant question here is whether the applicable District Plan provisions along with the Structure Plan would encourage the northern dune to be retained (re policies EW-P1, CE-P3(2), GRZ-P7). I have commended on this matter from an urban design perspective in Section 4 of this review, paragraphs 26-29).

Visual Effects

19. The Applicant's LEA follows the widely accepted approach and methodology outlined in the NZILA Guidelines for assessing landscape and visual effects. The visual effects which relate closely to urban design and issues of visual

integration explore key public and private views. The site visit confirmed that the visual catchment, the viewing audiences and the general location of the viewing points for public and private views (Fig 3 and Fig 4), have been suitably identified.

20. From an urban design perspective, issues of visual integration and visual amenity effects are directly linked to: (a) distribution of building form in terms of building height and setback from shared boundaries; and (b) width and type/density of planting within the proposed buffers. Recommended amendments to fully address these issues are discussed in Section 6 of my review while also responding to visual amenity issues raised by submitters.

4. DISTRICT PLAN

Relevant Statutory Provisions

21. The Applicant's LEA identifies the relevant District Plan provisions in terms of landscape, natural character and visual matters. These relate to the need to maintain character and amenity values and the quality of the environment and require that activities are appropriately located to ensure that any potential adverse environmental effects are avoided or mitigated (LEA, p 6-13). The provisions that are particularly relevant to the urban design outcomes include:
 - GRZ-P10: Residential Amenity
 - GRZ-P11: Residential Streetscape
 - GRZ-P12: Landscaping
 - GRZ-P20: Medium Density Residential Standards (Policy 10)
 - GRZ-P28: Retirement Villages
22. Policies GRZ-P7, CE-P3 (2) & (3) and EW-P1 are also relevant to the urban design outcomes in relation to boundary interface treatment and integration of the built form to the Site (see comments under paragraphs 26-29).
23. In addition, several of the policies under UFD-Urban Form Development (applicable to subdivision, use and development activities occurring across all zones and areas in the District) are also relevant in terms of urban design outcomes. These include:
 - UFD-P14: Urban Built Form
 - UDF-P1: Growth Management
 - UDF-P11: Amenity Values
24. Regarding the comments/conclusions in Section 6.4 of the LEA (Effects in Relation to Statutory Provisions) I note the following:
 - Compared to a residential subdivision, the perceived sense of density associated with retirement villages will be greater due to the housing typologies typically used in retirement villages (terrace housing, duplex units and buildings of greater bulk for shared facilities). This highlights the

issue of mitigating the visual impact of density via boundary interface treatment, noting that there are no specific provisions under the District Plan addressing urban/rural interface treatment, beyond the setback of buildings from the boundary and provisions relating to farming activities (which are not relevant to PPC4).

- To this end, the recommendations made to Appendix A provisions (Section 6 of my review) are important to ensure that the proposed planning framework is robust enough to help successfully implement the intended outcomes as described in the LEA (in general and particularly in the context of the proposed controlled activity status for retirement villages).
25. Subject to the recommended amendments/additions to the PPC, I generally agree with the conclusions in the LEA in relation to the relevant Statutory provisions concerning urban design outcomes, and that the proposed planning framework (including the relevant District Plan provisions combined with the PPC site-specific provisions/Structure Plan) *'will ensure local effects are appropriately managed'*.

Policies GRZ-P7, CE-P3 & EW-P1: Re Retention of the Northern Dune

26. Regarding the retention of the northern dune a question was asked whether the relevant District Plan provisions (under GRZ-P7, CE-P3 (2) & (3) and EW-P1 along with the Structure Plan would encourage the retention of the dune (refer paragraphs 17-18).
27. The above policies relate to managing effects of new development on natural character regarding topography and landform including (summarised):
- integration with the natural topography and landform to minimise impact of buildings ...on identified_landscape values (GRZ P7);
 - avoid/remedy or mitigate adverse effects on natural character / along with encouraging *'reinstating dunes which function as natural buffers where practicable'* (CE-P3 (2) & (3); and
 - manage earthworks to ensure adverse effects on natural landforms, residential amenity values and rural character values are remedied or mitigated (EW -P1).
28. The interpretation of the above policies relies on the site analysis to be undertaken at a resource consent stage to identify the specific characteristic/amenity features of the site. I note, however, that a site analysis and LEA have already been undertaken as part of the PPC request to help inform the site-specific provisions and the Structure Plan. With this in mind, I make the following observations:
- Under the PPC, it is anticipated that the Site's topography will be largely flattened.

- The Applicant does not consider the northern dune to be of high landscape value and therefore worthy of protection¹. Consequently, it hasn't been marked on the Structure Plan. Although DEV3-P1 d refers to the sensitive and effective integration of development platforms into the existing terrain, '*particularly at the northern ...edges*' it does not suggest that the northern dune should be retained. Notwithstanding this, the LEA (p.32) states that '*Sensitive earthwork design around the edges of the Site will ensure that any future development is appropriately integrated into the wider landscape, and the large areas of the dunes are retained (such as those which align the northern boundary of the site)*' [my emphasis]. There is no discussion in the body of the PPC4 request why the LEA recommendation to retain the dunes has not been carried forward into the structure plan itself.
 - There is a level of disagreement between the Applicant's and the Council's landscape experts as to whether the retention of the northern dune is warranted from a landscape character perspective. As mentioned earlier, from an urban design/site planning perspective, the dune is a prominent characteristic feature of the site's topography and part of the site's character and amenity value. For this reason, rather than for its arguable landscape value, it is best practice to retain/integrate such a feature, noting that much of the natural topography of the Site will likely be modified.
 - A future resource consent application will need to consider the relevant District Plan (general) policies along with the PPC site-specific provisions.
 - The absence of any specific reference for retaining the northern dune in the PPC provisions/Structure Plan would make its retention at the resource consent stage uncertain/arguable (notwithstanding the intended outcome under the LEA, p.32). In this sense, while the relevant policies can be interpreted as encouraging the retention of the northern dune, there are no site-specific provisions to enforce that, especially under a controlled activity status proposed for retirement villages.
29. To ensure certainty of the outcomes sought by the relevant District Plan policies and those intended by LEA, it is suggested that the retention of the northern dune and its integration into the development is ensured via amendments to the site-specific provisions. E.g. by: specifying a setback from the northern dune or setting up a greater width of the buffer around the dune's location); and (b) showing this on the Structure Plan accordingly.

¹ RFI response/ BM Memo (p.1) states that: '*The natural character of the Site, including the dunes which would be impacted by the proposed development, was assessed as being of low value due to the modification which has occurred across that Site (see Section 6.1. of the LEA). Therefore, it is not considered that the protection of these dunes within the Site area is required*'.

5. PROPOSED PROVISIONS/APPENDIX A: OVERVIEW

30. Appendix A of the PPC request contains site-specific policies/rules/standards to be applied in addition to the underlying GRZ rules and standards, and the rules and standards contained in Part 2 of the District Plan (District Wide Matters chapters). The proposed site-specific provisions include separate provisions for retirement villages and residential development and are supplemented by a Structure Plan Diagram (Fig 1).
31. Appendix A - Proposed Changes to the District Plan: Key observations:
 - a. The PPC includes provisions for Retirement Villages and separate provisions for Residential Activities and subdivision.
 - b. Proposed DEV3-R1 seeks to change the activity status for the development of retirement villages from a Restricted Discretionary (under the current General Residential Zone provisions) to a Controlled Activity. There are no changes proposed to the activity status for residential development.
 - c. The requested change to controlled activity (CA) for retirement villages will facilitate development by providing greater certainty for granting resource consent approval. However, the site-specific provisions are not sufficiently robust in my opinion to ensure certainty of the intended outcomes due to the lack of specific standards (e.g. minimum building setbacks and minimum width of proposed landscape/vegetated buffer). The Structure Plan Diagram (Fig 1) itself does not provide any further guidance on these matters either. Making amendments to the Appendix A provisions and the Structure Plan are recommended as outlined in the next section of my review. Further to this, the requested CA status for retirement villages is questionable given the uncertainty of some of the intended urban design outcomes.
 - d. The Structure Plan does not include a buffer along the entire perimeter of the Site, an issue that has also been raised by submitters (see comments in para 44-51 of my review). At this point I reiterate the importance of providing consistent interface treatment along the entire perimeter of the Site, as discussed in more detail in paragraphs 35-36 of my review.

6. SUGGESTED AMENDMENTS TO APPENDIX A: PROVISIONS & STRUCTURE PLAN

32. The PPC as notified (Appendix A-Proposed Changes to the District Plan/Feb 2025) has responded positively to some of the urban design issues raised in the Council's Sec 92 request. There are, however, a few remaining matters that require further attention, some of which have also been raised by submitters as outlined below.

Vegetated and landscaped buffers: definition

33. There is no systematic or clear explanation about the different role and treatment for the proposed 'vegetated' and 'landscaped' buffers respectively. DEV3-P1 (d)/(c) states that '*vegetated buffers on the southern extent of the Site should reflect the more 'wooded' character of the rural lifestyle properties along Ratanui Road*'. However, there is no information for the treatment of the landscaped buffer included in the policy (DEV3-P1), although DEV3-R1(b) describes the intended elements comprising their treatment. For consistency and clarity, it is recommended that the role/treatment of the proposed landscape and vegetated buffers is defined and included in the policy in a consistent manner.

Proposed Buffers: minimum width and planting details

34. The Applicant's RFI/Boffa Miskell Memorandum (15 February 2025) (BM Memo) outlined the different roles of the two types of buffers and associated landscape treatment for each type and specified their width at 5m. In addition, the BM Memo included a list of suitable planting species for the vegetated buffers including reference to their height (BM Memo p.2). However, this information has not been fully translated into the provisions.
35. I reiterate the importance of specifying the minimum width of the proposed buffers for reasons outlined in my Sec 92 report (6 January 2025 and subsequent feedback). Specifying the minimum width for the proposed buffers is also important as it indirectly sets up the minimum building setback from the shared boundary with adjacent rural lifestyle properties (refer Note under DEV3-R1 (and DEV3-R2). I also note that determining the building boundary setback is an issue raised by several submitters (refer Section 7 of this review). Therefore, including a provision for a 5m minimum buffer width supplemented with the suggested planting species is recommended along the entire perimeter of the Site (under DEV3-P1 (and DEV3-P2) and/or under the relevant rules).
36. The recommended extent of a 5m buffer along the entire perimeter of the Site, (i.e. including the part of the Site's boundary that abuts the GRZ) is to ensure continuity and a more coherent spatial and amenity outcome.

Landscaped Buffers: Intended treatment details

37. DEV3-R1 (1b) sets up the details for the design of the proposed landscaped buffer stating: *Details of design for the landscaped buffer (landscaping, fencing and/or planting).*' The way the rule is formulated suggests that the subject treatment can either be fencing or planting. Further to this, it is unclear what 'landscaping' exactly entails in that context. In the absence of specified buffer width (but not only for that reason) the rule can be interpreted to mean that fencing alone could be sufficient. Given the importance of the landscape buffer as a primary mitigation tool setting up the spatial/soft separation between the new buildings and the shared boundaries of adjacent neighbours, the rule needs to be robust and easy to interpret/administer. To address this, it is

recommended to amend the text in brackets (new text underlined) by taking a lead from the BM Memo² to read: '*Details of design for the landscaped buffer (landscaping/landscaped bunds or earthworks design, planting and/or fencing + planting)*'.

Minor Errors

38. The text under DEV3-P1 (Notified version of the document) uses only letters as a way of numbering the various policy matters. This leads to confusion as the sub-matters in the same policy are listed by also using letters. Further to this, DEV3-R1 refers to DEV3-P1.4 when there is no point 4 under that policy. It is recommended that both numbers and letters are used under DEV3-P1 as per DEV3-P2.

Structure Plan

39. The Structure Plan Diagram (Fig 1) is relatively high-level but includes the location of some key features. Overall, given the size of the Site's area the Structure Plan is generally acceptable subject to the amendments suggested below.

Extent of buffers shown on the Structure Plan

40. The proposed Structure Plan does not include buffers along the entire perimeter of the Site omitting parts of the Site's boundary, including: (a) parts of the western boundary; (b) parts of southern and eastern boundaries adjacent to 81 Ratanui Road; and (c) Ratanui Road boundary.
41. The lack of buffer, which otherwise indirectly sets up boundary setbacks, means that the District Plan minimum yard setback of 1.5m would apply under GRZ (refer Applicant's email/dated 25 February following the formal RFI response). Compared to the 5m side/rear boundary setback, this will raise issues of visual amenity and create inconsistent boundary treatment of the interface between the Site and the existing rural lifestyle properties - issues that have also been raised by submitters and which I consider to be valid (refer Section 7 of this review). For these reasons, it is recommended to extend the proposed buffer along the entire perimeter (see also comments under paragraphs 35-36 of my review) of the Site and to reflect this change on the Structure Plan accordingly.

Ratanui Road frontage treatment

42. The lack of a buffer or any other landscaping requirement along the Ratanui Road boundary means that the GRZ minimum setback of 1.5m would apply with no front yard landscaping required compared to a 10m setback under the RLZ. Given the Site's road frontage is defined on either side by rural lifestyle development and is generally characterised by vegetated road boundaries, I

² (RFI response, BM Memo, p. 2)

consider that a frontage landscape requirement of appropriate width/wooded character treatment will need to be incorporated into the PPC provisions as an integral component of the required Landscape Plan. I note that any such provision will also act as a setback from the road boundary. To this end a 5m landscape setback is suggested. By providing a soft/landscape transition between the road and the built form of development, this will ensure that the intended higher density development on the Site under the PPC will integrate appropriately into the existing primarily rural character of the road immediately around and to the east of the Site.

Northern Dune retention/integration (see detailed comments under paragraphs 28-29 of my review)

43. To ensure certainty of the outcomes sought by the relevant District Plan policies, it is suggested that the retention of the northern dune and its integration into the development is ensured via amendments to the site-specific provisions. E.g. by: (a) specifying a greater width of the buffer around the dune's location); and (b) marking the extent of the dune on the Structure Plan.

7. REVIEW OF SUBMISSIONS

Submissions re building height restrictions; vegetated buffers; location of multi-storey buildings

44. **Submission 6** (6.1) 81 Ratanui Road / Stephen Alexander & Linda Parsons - support in principle with amendments and seeking clarifications in relation to
 - Residential distance from the boundary of 81 Ratanui Rd
 - Location of multi-storey dwellings or facilities constructed adjacent to 81 Ratanui Road
45. **Submission 7** (7.2) - 85 Ratanui Road / Derek & Helen Foo - support the proposed Plan Change in principle but seek amendments based on the following concerns:
 - Visual intrusion created by the proposed 11m building height compared to the 8m height limit under the RLZ (noting that farm structures can be 11m tall)
 - Loss of primary outlook direction.
46. Requested amendments include:
 - a minimum 5m width for the vegetated buffer on the shared boundary
 - single level buildings within 100m of the shared southern border.
47. **Submission 8** (8.3) 91-91 Ratanui Road / Sarah & Dane Coles - opposes the Plan Change but if approved requests changes/amendments to mitigate impact on neighboring properties in terms of privacy, visual impact of proposed building height and density.

48. Amendments sought include:
 - 10m building setback from existing rural boundaries, particularly for 91 Ratanui Road
 - Only single-storey homes along the boundaries of existing rural properties (to minimise loss of outlook, light and character
 - reduced to max 150 dwellings
 - Privacy planting between 2-6m in height be installed by the developer along affected boundaries (any higher than 6m will affect the long-lasting sun on submitter's property)
 - Requests full structure plan for Otaihanga area before any further rezoning is approved
49. **Submission 10** (10.6) - 153 Mazengarb Road / Ellen Cohen c/o Montcalm Family Trust - support in principle with amendments. Concerns relate to:
 - Location of multi-storey building setbacks only 5m from the shared boundary and associated effects on potential development on the submitter's property should the zoning of the submitter's property change in the future
 - Impact of the development of any outdoor space that is developed on the boundary given the current rural lifestyle zoning of the submitter's property and expected future residential zoning.
50. Requested amendments include height restrictions along the perimeter of the Site + appropriate landscape buffer
51. **Submission 15** - 27A Ratanui Road / Paul Coggan - opposes the proposed Plan Change. Concerns and amendments sought include:
 - Proposed buffers cannot fully mitigate the loss of valued openness.
 - Seeks to extend the landscaped and planted buffer along the entire perimeter of the site.

Summary of Submitters' concerns / comments

52. Concerns and amendments sought by the different submitters tend to overlap with regard to two principal issues:
 - a. Extent and width of proposed buffer - setting up minimum width of 5m and extending the buffers along the entire perimeter of the Site to mitigate visual impact and improve integration; and
 - b. Location of multi-storey - managing effects via specified larger setbacks and/or height restriction along shared boundaries.
53. Re Extent and width of the buffers - I consider the concerns associated with the extent and width of the proposed buffers valid for reasons already discussed (Section 6 of my review), and therefore I reinforce my recommendations.

54. Re Location of multi-storey buildings - with regard to this matter and the amendments sought, I make the following observations:

- a. The difference between the height limit of 8m/10m in the RLZ and the maximum height of 11 under the PPC is one storey in relation to residential dwellings and 1m in relation to farm buildings.
- b. Under the PPC new buildings up to 11m tall can potentially be located within 5m from the shared boundary (provided that the buffer's width is confirmed at 5m). This has to be compared with the effects of a single 8m tall building setback 5m from the side/rear yard under the RLZ. While the potential building setback from the boundary under the PPC is commensurate with that under the RLZ, 11m buildings on the Site are anticipated to occur in a higher density environment. (i.e. the collective bulk of new development will be recognisably larger than that of a single building under the RLZ in terms of both height and building coverage).
- c. The proposed landscaped and vegetated buffers (provided they will be 5m wide and implemented as intended)³ will help to filter and largely screen views of 11m tall buildings. Therefore, they are an appropriate mitigation tool in terms of moderating visual impact of building height in per se but not necessarily fully mitigating the impact/perception of requested increased density. The latter will be influenced by the location of any 11m tall buildings relative to the Site's boundary. In this sense, I understand the submitter's request to introduce a larger setback (10m/under Submission 8) or restrict building height along the shared boundaries of the Site (Submissions 7 & 10). While any such restrictions might unduly limit flexibility of site planning arrangements across the Site, adopting a 'built form' concept where building height increases from the periphery to the centre of the Site would be a suitable and logical response to the primarily rural context of the Site, in my opinion. Adopting such an approach to the distribution of building form/mass across the Site will support: (i) a more consistent and sensitive boundary interface treatment, and (ii) provide a greater certainty of outcomes for immediately adjacent rural properties (in terms of privacy, visual impact and perception of density). At the same time, this will retain a level of flexibility in terms of development options and site planning arrangements. For these reasons, adopting a 'stepped building height' approach as part of the plan change, especially under the proposed CA for retirement villages, is suggested. This can be implemented via adopting and incorporating a new site-specific provision where development along the Site's periphery is primarily single storey with building height anticipated to increase towards the centre of the Site.

³ This will include a thorough analysis at the time of the resource consent application to determine the specific treatment of the buffer in terms of planting density, type and height.

- d. As a separate but related issue, I note that specifying the building setback at 5m (via the buffer provisions or otherwise) is supported for reasons already discussed. In any case, reinforcing the Note under DEV3-R1 by incorporating it as part of the rule will provide a greater certainty of the intended outcome and is therefore recommended.

Submissions re Council-led zoning

55. A number of submissions⁴ raise the issue of piecemeal rezoning and its potential to compromise development outcomes in the wider area. The subject submissions suggest that rezoning of the Site should be considered in the context of a wider area review as part of the District Plan, although the extent of that 'wider area' in the individual submission varies. I have been asked to comment on that issue from an urban design/urban planning 'outcome' perspective. More specifically to address key questions such as:

- Q1: Would the rezoning of just this land compromise good urban design outcomes for the surrounding RLZ should it also be rezoned (at a later stage)?
- Q2: Is it acceptable to rezone the subject Site, separate to a structure plan for all the RLZ area?

56. The two questions are interrelated, and the answer is largely founded on comparing the outcomes of the incremental rezoning of the Site (in a 'piecemeal' fashion) with a more comprehensive approach to the rezoning of the wider RLZ area (with or without a structure plan for that wider area). Note that the wider area is included in the Growth Strategy, albeit not as an immediate priority.

57. In answering these questions some of the key features of the Site need to be taken account of such as:

- the relatively large size of the Site and its configuration (with an irregular and complex outline of its southern boundary);
- the Site's location, which although close to the area with GRZ zoning, is largely separated from it, noting that the Site's immediate context is primarily rural lifestyle;
- the road frontage of the Site which sits near to the south/western 'entry point' to the rural lifestyle area and forms an integral part of Ratanui Road and its wider rural context/character.

Question 1: Would the rezoning of just the Site compromise good urban design outcomes for the surrounding RLZ should it also be rezoned (at a later stage)?

⁴ Submissions S2, S10, S14, S15,

58. In principle, the issue of piecemeal rezoning is a valid concern from an urban design/urban planning perspective and particularly in relation to the specific location of the Site, its size and configuration.
59. Best urban design practice promotes a comprehensive and coordinated approach to planning to achieve integrated and more cohesive outcomes in terms of connectivity, transport and infrastructure, open space network, distribution of urban form, continuity of interface treatments, and response to cultural, landscape and ecological values. This approach has been widely used, and its advantages are well understood. Taking this as a starting point, the rezoning of just the land under the PPC would potentially affect key outcomes in relation to:
- Missed opportunities for a more connected environment at a macro scale and an integrated approach to infrastructure - missed opportunities for connecting the Site to the wider area (at least under the 'residential development' scenario).
 - Fragmentation of the existing rural lifestyle area - the requested incremental rezoning of the Site will fragment a relatively compact area with rural-lifestyle zoning (to the west of Otaihangā Road) by: (a) carving out a substantial portion of it and creating a large and somewhat 'dead-end' site precluding potential 'connectivity' in the wider area; and (b) leaving an isolated pocket of rural lifestyle properties (immediately to the west of the site) surrounded on all sides by GRZ, thereby questioning the relevance of its rural lifestyle zoning.
 - Uncertainty re shared boundary treatment - a comprehensive approach to reasoning would have helped to simplify boundary treatments and reduce uncertainty as to building setbacks and boundary landscaping (i.e. simpler and easier management of effects).

Question 2: Is it acceptable to rezone the subject Site, separate to a structure plan for all the RLZ area?

60. Having a wider scope, this question nevertheless largely overlaps with the first one and includes some of the issues already listed above.
61. A structure plan is an established planning tool in the rezoning of low density or undeveloped land. It is best practice that a structure plan is prepared prior to undertaking any rezoning to ensure the rezoning is considered comprehensively in the context of the wider area and is appropriately integrated. In this sense, the incremental rezoning of just the subject Site (albeit supported by its own Structure Plan) is not best practice. It has been generated in the absence of a comprehensive 'bigger picture' of intended changes for the development of the wider area enabling compatible patterns/intensities of development across sites in different land ownership.

62. With this in mind, rezoning the Site in isolation would potentially affect the (urban design) outcomes for a structure plan for the wider RLZ, mainly in respect to:
- Connectivity - missed opportunities to future proof possible connections from the Site (under the residential development scenario) and connect the Site to existing/planned network of wider pedestrian/cycling connections;
 - Compactness and rationalised boundaries of potentially rezoned areas - missed opportunity to creating more compact areas with the same zoning and more consistent treatment of boundary interfaces as part of a co-ordinated decision on whether the entire area or only parts of it might be suitable for rezoning. In relation to the subject Site, a co-ordinated approach under a wider area structure plan would have: (a) avoided the fragmentation effect of the requested rezoning; and (b) simplified the approach to boundary treatment;
 - Cohesiveness and sense of integration - compromised opportunity for achieving a more cohesive development across the wider area where infrastructure and variation in density and land uses occurs in a co-ordinated way under the same provisions, thereby contributing to a more integrated development of the area's constituent parts. In the context of the PPC, the proposed restrictions/controls on development (re buffer/setbacks and landscape boundary treatment) would most likely not have been necessary if the wider area was rezoned at the same time. This means that under a future wider area rezoning, development on the Site under the PPC would appear somewhat segregated from its anticipated urban surroundings; and
 - Certainty of outcomes for stakeholders, developers and the general public regarding spatial changes in the character of the urban landscape. Note that the requested rezoning of the Site, outside a structure plan for the wider RLZ, will accentuate the uncertainty for both the adjacent properties and for the surrounding area given that a wider area rezoning is pending at some time in the future under the Growth Strategy.
63. Bottom line - Structure plans are crucial for achieving good urban design and promoting quality outcomes. To achieve that, any rezoning should ideally be done as part of structure plan for the wider area.

8. CONCLUSIONS

64. The review of urban design effects established that subject to further amendments, the proposed provisions in the PPC Appendix 1, including the Structure Plan will be able to manage the identified urban design effects and generally respond to some key concerns raised by Submitters. These relate to firming-up provisions around buffer extent and width, building setback, building

massing across the site and landscape treatment along the Ratanui Road frontage.

65. The Review also established the incremental/piecemeal approach to the rezoning of the Site would potentially compromise some of the urban design outcomes for the wider area compared to those generated as part of a wider area rezoning exercise, and/or as part of a Structure Plan for the wider RLZ.



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