

From: [John Le Harivel](mailto:xtr181373@xtra.co.nz) xtr181373@xtra.co.nz
To: [Mailbox - District Planning](#)
Subject: Submission on Proposed Plan Change @ OKCDP
Date: Wednesday, 14 September 2022 11:16:37 am

In general I support intensification of housing within areas of transport nodes and town centers.

I have some reservations around the detail of the proposed changes.

We cannot continue with the current forms of sub-division that are car dependent and wasteful of valuable productive land and do not support the effects of climate change. (around 30% wasted on excessive roading, footpaths, service areas and planning).

In overall district planning terms it makes no sense to have large areas of land zoned for rural residential use centrally, as we have in Paraparaumu. Rural residential zone areas should be on the periphery of towns

GENERAL ISSUES

However I consider the NPS-UD an ill considered political solution based purely on economic factors that is a one size fits all strategy that ignores the complexity, variable size and variety of urban environments. While housing intensification may well meet a demand for more housing there is some doubt it will lead to affordable housing since higher density housing involves additional complexities (e.g. fire and sound separation, weather tightness, legal, ownership, energy use, healthy homes standards, maintenance of communal spaces, increased structural engineering considerations, different forms of construction and materials required (e.g. concrete and steel frame for higher buildings), lifts required 4 stories and above, increased consent requirements (e.g. facade engineering, sprinklers, lifts, etc.) resulting in increased expense in its development.

EFFECTS ON NEIGHBOURS

There is the lack of consideration of the effects on existing neighbours in terms of reduction in sunlight, light, privacy, view, and landscape, etc. There needs to be safeguards in terms of ensuring solar access not only within new developments but particularly to existing dwellings. The boundary to height recession planes proposed are far too simplistic. Tools exist to ensure a much more nuanced approach that would improve the quality of design. (There should be different recession planes for different orientations). There should be a requirement to ensure a specific number of hours of solar access to existing dwellings.

PRIVACY

There is a lack of privacy and specific separation distances between habitable rooms. (Suggest the Australian Standard be adopted which takes into account different heights of new buildings when considering separation distances). The 1m outlook requirement for bedrooms is diabolically bad as are the yard distances.

INTENSIFICATION AREA BOUNDARIES

There is the lack of clarity around the proposed boundaries of the various proposed areas for intensification and the logic upon which they were decided.(and whether they would be contested)

LACK OF EXPERTISE

In New Zealand there is a lack of expertise in the design, construction and consenting sectors in developing higher density housing that has resulted in some seriously bad solutions. There is a lack of regulation and confusion around what standards apply. (Timber frame is currently only possible up to 3 stories under NZS 3604).

FLOOR TO CEILING HEIGHTS

Increases in minimum floor to ceiling heights are required to ensure adequate solar penetration and the accommodation of services.

VARIETY OF HOUSE TYPES

I agree with the need to ensure variety of house types and sizes in any one development but I am unclear how this would be enforced.

COMPLEX WORDING

The wording of the proposed changes appears complex and confusing and needs to be simplified and a streamlined consent process instigated.

INFRASTRUCTURE ISSUES

Intensification will involve additional expense in the provision of infrastructure, not just the pipes and cables but also the associated paths, landscaping and additional public communal areas and their servicing.

VALUE ADD

There is no consideration given to the Value Add gained by private landowners where they develop intensified projects on existing sites.

NECESSITY FOR GOOD DESIGN

Ultimately there needs to be incentives and good guidance to ensure well designed environments which have a long term community benefit. This could be enhanced by the use of external design review panels.

PUBLIC TO PRIVATE SEQUENCE

It is important that the sequence from public to semi public to semi private to private space is incorporated to delineate boundaries as well as the incorporation of CEPTED principles to ensure a safe and healthy environment.

ZERO LOT OPTIONS

I am unclear whether zero lot solutions are specifically enabled. (There are very good historic examples of well designed terrace housing, think Nash terraces, Georgian terraced houses, Sydney city center terraced houses, London terraced houses. It does not have to be Coronation Street type solutions)

Individual not representing any group.

From: [John Le Harivel](#)
To: [Mailbox - District Planning](#)
Subject: RE: Submission on Proposed Plan Change @ OKCDP
Date: Thursday, 15 September 2022 6:39:46 pm

Hi Abbey, Flexible as to submission arrangements. If joint are we still restricted to 3 minutes! JLeH

On 15/09/2022 14:06 Mailbox - District Planning
<district.planning@kapiticoast.govt.nz> wrote:

Hi John

Thank you for letting me know regarding the hearing. If others make a similar submission, would you consider presenting a joint case or not with them at a hearing?

Kind regards,

Abbey Morris
Planning Technical Support Officer

Kāpiti Coast District Council
Tel 04 296 4725
Mobile 027 3037 312

www.kapiticoast.govt.nz

From: John Le Harivel <xtr181373@xtra.co.nz>
Sent: Thursday, 15 September 2022 1:49 pm
To: Mailbox - District Planning <District.Planning@kapiticoast.govt.nz>
Subject: RE: Submission on Proposed Plan Change @ OKCDP

Hi Abbey,

Thanks for the acknowledgement of my submission. I should have noted I am interested in presenting in person whenever the hearings take place, presumably in the next triennium. Regards John Le Harivel

On 15/09/2022 13:32 Mailbox - District Planning
<district.planning@kapiticoast.govt.nz> wrote:

Hi John

Thank you for submitting on Plan Change 2: Intensification.
Acknowledging that your submission has been received.

Kind regards,

Abbey Morris
Planning Technical Support Officer

Kāpiti Coast District Council
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Mobile 027 3037 312

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