

## Memorandum

To Appendix 7: Urban Design Report / Addendum

From Deyana Popova / Consultant Urban Designer  
Urban Perspectives Ltd

Subject Private Plan Change Request (PPC4) by Welhom  
Developments Ltd / Urban Design Review Addendum  
Report

Date 31 January 2026

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### 1. INTRODUCTION

1. My full name is Deyana Ivanova Popova. My qualifications and experience are stated in the Urban Design Report (Appendix 7) I prepared on behalf of the Council in relation to PPC4 (Urban Design Report).
2. In this addendum report I provide my response to the:
  - a. Landscape and Visual Effects Evidence of Ms Gardiner on the key issue in contention (proposed buffer extent and width); and
  - b. Planning Evidence of Mr McDonnell/Appendix 1: Proposed Changes to the District plan regarding some of the proposed changes to Appendix 1 relative to those recommended in Sec 42A Report.

### 2. LANDSCAPE AND VISUAL EFFECTS

#### **Extending the buffers along the entire perimeter of the site**

3. Sec 42A Report recommended amending the Structure Plan to extend the proposed buffer along the entire perimeter of the Site including the Rataatnui Road frontage. The same recommendation was included in my Urban Design Report.

4. However, Ms Gardiner does not consider that '*a continuous buffer around the entire Site boundary is necessary or appropriate*'<sup>1</sup>. Instead, she considers that:
  - i. '*applying buffers indiscriminately would not deliver meaningful landscape outcomes and could create an artificial edge that is inconsistent with the evolving character of the wider area, which is anticipated to undergo further urban development over time. In this context, a site-wide permitter buffer risks isolating the development rather than enabling its integration into the surrounding urban fabric*'<sup>2</sup>; and
  - ii. '*a more nuanced approach focused on areas of high visual sensitivity and informed by detailed design at resource consent stage will better achieve the intent of the LVEA to ensure sensitive and effective integration into the existing terrain and local context*'.<sup>3</sup>

#### **Minimum buffer width**

5. Sec 42A Report recommended including a 5m minimum buffer width in the provisions<sup>4</sup>, a matter discussed in my Urban Design Report.
6. On the issue of buffer width, Ms Gardiner summarises her RFI response (Boffa Miskell Memorandum, 15 February 2025) (BM Memo) explaining that '*A 5m buffer width was indicated as it was considered that this would allow enough space for planting, which would create a meaningful and effective screening*'.<sup>5</sup>
7. However, Ms Gardiner states<sup>6</sup> that after further consideration '*applying a uniform 5m width across the entire Site boundary would not reflect the varying levels of visual sensitivity along the perimeter*' and that '*the plan change provisions should set out the principle of providing buffers, but leave the detailed design, including minimum width buffer, to be determined at the resource consent stage*'. This is '*to ensure flexibility to respond to site-specific conditions and future context, while still achieving the outcomes anticipated in the LVEA*'.<sup>7</sup>

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<sup>1</sup> Paragraph 6.11 Statement of Evidence - Alexandar Gardiner

<sup>2</sup> Paragraph 6.12 Statement of Evidence - Alexandar Gardiner

<sup>3</sup> Paragraph 6.13 Statement of Evidence - Alexandar Gardiner

<sup>4</sup> Paragraph 26, Section 42A Report

<sup>5</sup> Paragraph 6.15 Statement of Evidence - Alexandar Gardiner

<sup>6</sup> Paragraph 6.16 Statement of Evidence - Alexandar Gardiner

<sup>7</sup> Paragraph 6.17 Statement of Evidence - Alexandar Gardiner

8. In response to Ms Gardiner position I make the following observations:
9. Buffer extent and width are interrelated matters that, to achieve the anticipated outcomes of the LVEA, need to be considered in relation to the proposed Controlled Activity (CA) status for retirement villages.
10. Conceptually, the purpose of buffers is to provide a sense of physical/spatial separation, as well as screening. Physical separation is determined by the width of the buffer while screening is dependent on the density/type/extent of planting or other means of screening and earthworks design where relevant. The specific physical parameters of buffers determine how effectively they fulfil their intended purpose in each context. Under PPC4 the proposed buffers also indirectly set up the anticipated minimum building setback (DEV3-R1/Note).
11. Under PPC4, the proposed buffers are the primary means of managing the interface between rural and residential environments in terms of amenity effects on neighbouring properties, moderating differences in density and built character, and supporting the integration of the site into its surrounding context.
12. Currently most of the surrounding properties are located in the RLZ. While future rezoning of the wider area is anticipated under the Growth Strategy, this is a medium priority with an undetermined timeframe. Consequently, in the indefinite interim the proposed buffer provisions need to ensure that rural-residential interface issues are adequately addressed.
13. Given that most of the Site borders properties within the RLZ, extending the buffer along the entire perimeter of the Site, along with indicating the anticipated 5m minimum buffer width, as recommended in Sec 42A Report, is appropriate and necessary, in my opinion, as it will:
  - a. provide a suitable and needed separation distance between the intended higher density built form on the Site and its 'rural' neighbours;
  - b. allow '*enough space for planting, which would create a meaningful and effective screen*' (as suggested by Ms Gardiner <sup>8</sup>); and

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<sup>8</sup> Paragraph 6.15 Statement of Evidence - Alexandra Gardiner

- c. provide a clear policy direction and ensure both consistency and a greater certainty of outcomes.

14. In my opinion, extending the buffer along the perimeter of the Site and specifying an anticipated minimum buffer width of 5m is unlikely to 'create an artificial edge' or 'risk isolating the development' (as suggested by Ms Gardiner<sup>9</sup>, for several reasons.

15. While a 5m minimum buffer width will establish a continuous spatial 'strip' along the site boundaries, it does not preclude flexibility for site-specific landscape responses to boundary treatment (in terms of the actual width, density and height of planting or earthworks design). Rather, the 5m minimum buffer width will delineate the general area within which varied buffer treatments can be implemented, without the need to fully or uniformly plan the entire area in every situation. In this way, the extent, nature, and degree of screening can vary to reflect the differing levels of design sensitivity along the site perimeter, with the specific response to be determined at the resource consent stage (i.e. without compromising the preferred approach of Ms Gardiner). Accordingly, extending the buffer along the site perimeter and specifying a 5m minimum width is unlikely to create an artificial edge or compromise the integration of the site into its surrounding context.

16. In reiterating her view that applying a 5m wide buffer along the entire site perimeter risks isolating the development, Ms Gardiner<sup>10</sup> refers to a point I made in my Urban Design Report<sup>11</sup>. That point, among other findings, was made in the context of comparing outcomes achieved under PPC4 with those anticipated under the wider area rezoning. As already noted, the primary purpose of the proposed buffers is, in the first instance, to manage the interface between the rural and residential environments under the current planning context.

17. In the absence of a minimum buffer width provision, and given the limited extent of the buffers indicated in the Proposed Structure Plan, the landscape

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<sup>9</sup> Paragraph 6.12 Statement of Evidence - Alexandar Gardiner

<sup>10</sup> Paragraph 6.12 Statement of Evidence - Alexandar Gardiner

<sup>11</sup> ...that under a future wider area rezoning, development on the Site under PPC would appear somewhat segregated from its anticipated urban surrounding's, Paragraph 69, Urban Design Report/Appendix 7

outcomes under Ms Gardiner's preferred approach<sup>12</sup> would be uncertain and difficult to effectively implement, in my opinion, due to: (a) a lack of clear policy direction; and (b) the proposed CA status.

18. In the absence of a minimum buffer width provision, the minimum yard setback of 1.5m under the GRZ would apply. This setback, in my opinion, will be highly insufficient to adequately address the identified rural/urban interface issues. Without a clearer policy direction, negotiating or enforcing an alternative buffer width may be challenging, particularly under the proposed CA status for retirement villages.
19. In my opinion, to effectively manage the residential/rural interface under PPC4 specifying an anticipated minimum 5m buffer width is required to allow mitigating impact on views and aiding the integration of new development to the existing context. Furthermore, an activity status that allows a greater level of discretion is required to ensure certainty in achieving the intended outcomes.
20. I note that the planning evidence of Mr McDonnell prefers Ms Gardiner's evidence, and consequently, the recommendation in the Sec 42A report to include a 5m minimum buffer width under DEV3-P1(4c)(i) & (4e) (i) and DEV3-P2 (5c)(i) & (5e)(i) has been removed (refer Appendix 1/Mr McDonnell evidence). In my opinion, including a 5m buffer width in the proposed provisions should be retained for the reasons discussed in my Urban Design Report and this Addendum Report.

#### **Managing placement of tall buildings within the site**

21. In relation to submitters' concerns Ms Gardiner<sup>13</sup> reiterates that the proposed provisions are sufficient to address the anticipated amenity and visual effects with no further amendments to the provisions required. Ms Gardiner does not address specifically the recommendation for a 'stepped built form' discussed in my Urban Design Report and the associated recommended new provision included in Sec 42A report/ Appendix 4 (re location of the tallest buildings in the middle of the site (under DEV3-P1 (4f) and DEV3-P2 (5f).

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<sup>12</sup> Paragraphs 6.13 and 6.17 Statement of Evidence - Alexandar Gardiner

<sup>13</sup> Paragraphs 7.10 -7.22 Statement of Evidence - Alexandar Gardiner

22. However, in response to submitters' concerns regarding the impact of tall building, Ms Gardiner does not consider that '*imposing fixed height limits*' amongst other things, at a plan change level is required to achieve the intended landscape outcomes.<sup>14</sup>
23. In my opinion, the recommended new provision (under DEV3-P1 (4f) and DEV3-P2 (5f) does not impose fixed height limits. Rather, it provides general guidance on future massing across the Site by encouraging 'a form of development where the tallest buildings are located towards the middle of the site, where practicable'.
24. The subject recommendation was removed by the Requestor as indicated in Appendix 1 to Mr McDonnell evidence. For the reasons outlined in my Urban Design Report<sup>15</sup> and this Addendum Report I reiterate my recommendation and consider that it should be included in the provisions.

#### **Points for clarification**

25. Ms Gardiner<sup>16</sup> does not support a uniform 5m buffer width along the entire site boundary. However, the evidence is silent on why the 5m buffer width, as recommended in her RFI (MF Memo)<sup>17</sup>, should not be applied along the limited extent of buffers shown in the Structure Plan (i.e. without extending the buffer along the entire site perimeter).
26. I also note that no explanation was provided by the Requestor during the RFI process as to why the 5-metre buffer width recommended by Ms Gardiner in her RFI (MF Memo) response at the time was not incorporated into the provisions.

### **3. PLANNING EVIDENCE / MR MCDONNELL (Appendix / Proposed Changes)**

#### **Width of vegetated and landscaped buffers**

27. Sec 42A Report and associated Appendix 4 recommended including a 5m minimum buffer width in the provisions in relation to both Retirement Villages and Residential Activities under DEV3-P1 (4c)(i) & 4e (i) and DEV3-P1 (5c)(i)

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<sup>14</sup> Paragraphs 7.15 Statement of Evidence - Alexandar Gardiner

<sup>15</sup> Paragraph 61, Urban Design Report/Appendix 7

<sup>16</sup> Paragraphs 6.16 Statement of Evidence - Alexandar Gardiner

<sup>17</sup> RFI, Boffa Miskell Memo, 13 February 2025, p.2

& (5e) (i) respectively. The recommended new provision has been removed by the Requestor. For the reasons discussed in my Urban Design Report and in this Addendum Report, I consider that the anticipated 5m minimum buffer width should be included in the provisions.

#### **Vegetated Buffers/DEV3-P1(4c) (iii) /Retirement Villages**

28. Under DEV3-P1(4c) (iii) (Appendix/Proposed Changes to the District Plan) Mr McDonnell has added further explanation (shown in red below) to the recommended (new) provision in Sec 42A Report (shown in blue).

iii. provide filtering of views into the site from adjacent dwellings where practicable, and
29. The proposed addition clarifies the purpose of the provision (i.e. from what locations the filtering effect on views to the site will be experienced). However, in doing so, it narrows down available views that can be obtained from various locations within the adjacent properties to views obtained from adjacent dwellings only (rather than adjacent properties). The reasons for this are unclear. In my opinion, the proposed amendment does not reflect the intended purpose of vegetated buffers, which I understand are to manage visual effects/impact on views from the surrounding environment and the adjacent properties in general. In my opinion, the word 'dwellings' should be replaced with 'properties' or 'sites'. I note that 'sites' has been used in relation to the proposed landscaped buffers under DEV3-P1 (4e)(ii). The use of consistent language is recommended.
30. The proposed addition of 'where practicable' further reduces the scope and certainty of achieving the intended outcome and should, in my opinion, be removed.
31. I note that the proposed addition to DEV3-P1(4c)(iii) (Appendix 1) discussed above for Retirement Villages has not been included in the equivalent provision under DEV3-P2 (5c)(iii) for Residential Activities. The reasons for that are unclear.

### **DEV3-P1 (4f) and DEV3-P2 (5f)**

32. DEV3-P1(4f) and DEV3-P2(5f) are identical policies recommended for inclusion in the provisions for both Retirement Villages and Residential Activities. These policies, which promote 'a form of development where the tallest buildings are located toward the centre of the site', have been removed by the Requestor. For the reasons outlined in my Urban Design Report, I consider that these policies should be included to ensure the anticipated outcomes are achieved.

## **4. CONCLUSIONS**

33. In summary:

- a) I reiterate that in the context of PPC4 the extent and width of the proposed buffers - being the primary means of managing the interface between rural and residential environment - are interrelated issues that should be considered in relation to the proposed CA activity status.
- b) I reinforce my recommendations on the following matters:
  - (i) extending the buffer along the entire perimeter of the site and reflecting this accordingly on the Structure Plan;
  - (ii) including a provision for a 5m minimum buffer width in Appendix 1;
  - (iii) including a provision for built form development where the tallest buildings are located towards the middle of the site in Appendix 1; and
  - (iv) considering the suggested amendments to Appendix 1 (DEV3-P1 (4c)(iii)).
- c) If a decision is made not to include the recommended 5m minimum buffer width in the provisions, I reiterate that the intended outcomes under Ms Gardiner's preferred approach and that supported by Mr McDonnell (i.e. manage boundary interface treatment at a resource consent stage without a provision for a minimum buffer width)<sup>18</sup>, would be difficult to achieve or enforce unless:

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<sup>18</sup> Paragraphs 6.17 Statement of Evidence - Alexandar Gardiner

- (i) an alternative but sufficient minimum buffer width is included in the provisions;
- (ii) the buffer is extended to apply along the entire perimeter of the Site; and
- (iii) the activity status under DEV3-R1 is changed to RDA to allow a higher level of discretion in determining what constitutes a suitable and effective boundary interface treatment at a resource consent stage.

Deyana Popova

Urban Designer

A handwritten signature in black ink, appearing to read "Deyana Popova".