

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
AT RANGIORA / WAIMAKARIRI**

**MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE  
RANGIORA / WAIMAKARIRI**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the hearing of submissions and further submissions on the **Proposed Waimakariri District Plan**

**HEARING TOPIC:** Stream 7B Variation 1

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**STATEMENT OF PRIMARY EVIDENCE OF JANE RENNIE  
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

**URBAN DESIGN**

**11 SEPTEMBER 2024**

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**Instructing solicitor:**  
C E Kirman  
Special Counsel  
Kāinga Ora - Homes and Communities  
PO Box 14594  
Central Auckland 1051  
E: [claire.kirman@kaingaora.govt.nz](mailto:claire.kirman@kaingaora.govt.nz)

## 1. EXECUTIVE SUMMARY

- 1.1 My name is Jane Rennie and I am a Partner at Boffa Miskell Limited. I have been engaged by Kāinga Ora – Homes and Communities (**Kāinga Ora**) to provide urban design evidence in support of its submission (submitter #80) and further submissions (further submitter #23) on Stream 7B Variation 1 Housing Intensification (**V1**) to the Proposed District Plan (**PDP**) relating to the Medium Density Residential zone (**MRZ**).
- 1.2 In this evidence I review the proposed approach to intensification and building heights adjoining the Rangiora Town Centre and the Matters of Discretion applying to four or more residential through the 'Residential Design Principles'.
- 1.3 I have considered the amendments sought by Kāinga Ora and recommend a refinement to the boundary of the height variation control area (**HVCA**) to better reflect a 800m or 10 minute walk in Rangiora. I recommend that an 18m height limit is sufficient to achieve the outcomes sought for the HVCA and relevant NPS-UD policies. I do not consider that the proposed sunlight and shading Qualifying Matter adequately consider the future built form outcomes anticipated or step change in development patterns required.
- 1.4 I recommend amendments to the assessment matters to strike an appropriate balance between flexibility of design, enabling opportunities and change to provide for higher density housing typologies in the context of achieving a well-functioning urban environment.

## 2. INTRODUCTION

- 2.1 My full name is Jane Maree Rennie. I am an Urban Designer and Partner with Boffa Miskell Limited, based in the firm's Christchurch office. I have been employed by Boffa Miskell since 2009.

- 2.2 I hold the qualifications of Bachelor of Planning from Auckland University (1994) and a Post Graduate Diploma (Merit) in Urban Design from the University of Westminster (London) (2005).
- 2.3 I am a Full Member of the New Zealand Planning Institute. I am a member of the Urban Design Forum, a Crime Prevention Through Environmental Design (**CPTED**) Practitioner<sup>1</sup> and a member of the Lyttelton Design Review Panel. The role of the Panel is to provide design advice to promote good design and a quality urban environment that expresses the local character and identity of Lyttelton.
- 2.4 I have 27 years' experience working in Urban Design and Urban Planning in New Zealand, North America, and the UK for both the public and private sectors. My professional areas of expertise include concept and master planning, spatial planning, precinct plans, urban amenity and character studies, urban design assessments, policy development and guidance, land use and public transport integration, public and stakeholder engagement and CPTED.
- 2.5 I have been engaged by Kāinga Ora since 2023 to provide urban design expertise on V1 to the PDP relating to the MRZ. I have assisted with background work to support Kāinga Ora's original submission on V1.
- 2.6 In my work at Boffa Miskell I have previously been involved in the urban design for the Rangiora Town Centre Strategy including the vision, broad strategy, key moves and development opportunities. I have had background involvement in the scoping of structure plans for new greenfield areas in Rangiora. I have also been the lead urban designer for the Mass Rapid Transit Business Case for Greater Christchurch, which has involved analysis of Rangiora in the context of future provision for trains, light rail or bus rapid transit linking Rangiora with Christchurch. I have prepared evidence for and appeared in resource management consent and plan hearings, Environment Court mediations and Environment Court hearings.

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<sup>1</sup> International Security Management and Crime Prevention Institute Advanced Workshop Training, 2017 / Advanced CPTED Training Course, Frank Stoks, 2010.

- 2.7 I am familiar with the Kāinga Ora corporate intent in respect of the provision of housing within the Waimakariri District and am familiar with their recent developments in Rangiora. I am also familiar with the national, regional and district planning documents relevant to V1 of the PDP.
- 2.8 In preparing this evidence I have read the relevant sections of the District Plan as notified, Section 32 and 42A reports together with the associated technical reports prepared by Council staff in particular Mr Wilson, along with the evidence of Mr McIndoe (Urban Designer) on shading effects of theoretical building forms.
- 2.9 I have undertaken a site visit with Ms Dale (Planner representing Kāinga Ora) on the 20<sup>th</sup> of June 2024 where we focused on the Rangiora Town Centre area.

#### **Code of Conduct**

- 2.10 Although this is a Council hearing, I have read the Environment Court's Code of Conduct and agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this statement of evidence are within my area of expertise.
- 2.11 Except where I state that I am relying on the evidence of another person, my written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

#### **Scope of Evidence**

- 2.12 My evidence relates to submissions and further submissions on Stream 7B V1 in relation to the nature and extent of the height limit adjoining Rangiora Town Centre and associated built form provisions and the matters of discretion relating to 'Residential Design Principles'. Specifically, my evidence will address the following:

- (a) **Objectives and Policies - RESZ – Whaitua Nohonoho – Residential Zones – Medium Density Residential Zone:**  
Requested amendments to Policy RESZ-P15 to allow greater

building heights in an identified area near Rangiora Town Centre and associated changes to Policy MRZ-01 relating to housing types and sizes (Submission point 80.39).

- (b) **Built Form Standards – MRZ-BFS4 Height:** Requested changes to include the Height Variation Control Area and associated height limit in this Area (Submission point 80.40, 80.41 and 80.50).
- (c) **Matters of Discretion – RES-MD2 Residential Design Principles:** Requested changes to the proposed assessment matters for the MRZ, which are considered to be lengthy with MRZ-MD2 specifying nearly 30 individual matters (Submission point 80.52).

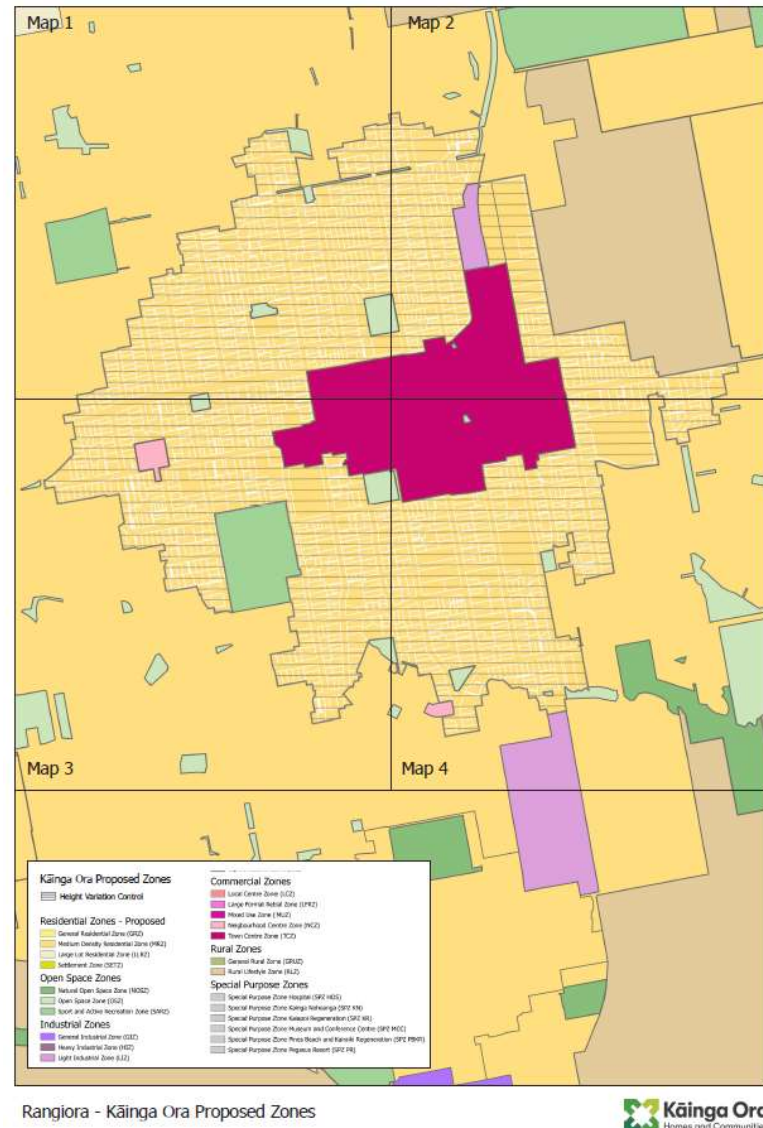
2.13 Where appropriate and relevant, my evidence will reference and rely on the evidence of other experts, whose opinion I agree with.

### **3. KĀINGA ORA'S SUBMISSIONS AND FURTHER SUBMISSIONS**

3.1 The Kāinga Ora submission and further submission points allocated to the Stream 7B hearing are set out in detail in Ms Dale's evidence. Of direct relevance to my Urban Design evidence are the following submission points:

- (a) Kāinga Ora considers that residential intensification in and around the Rangiora Town Centre should be further encouraged and enabled in accordance with the NPS-UD. This is in line with the imperatives of the NSP-UD which notes that compact urban form in the context of existing urban areas requires further intensification. Kāinga Ora seeks the inclusion of a Height Variation Control Area around the Rangiora Town Centre for higher density housing to a height limit up to 19m or five storeys. Figure 1 sets out the scope of the HVCA sought by Kāinga Ora. This aligns with the boundary of the Medium Density Zone notified in the PDP (prior to the MDRS) and roughly aligns with the 10min walk or 800m extent.

- (b) Kāinga Ora seeks amendments to the matters of discretion in order to ensure they are easily understood, focus on the outcomes intended, avoid duplication and provide for design innovation and choice. The current matters of discretion along with those recommended by Kāinga Ora are set out in **Appendices 3 and 4.**



**Figure 1:** Identification of the HVCA around the Rangiora Town Centre Zone (hatched area) with the wider MDRS area in yellow (see Appendix 1 for a larger scale version of the map)

- (c) Kāinga Ora oppose Submission #26<sup>2</sup> which seeks provision of medium density housing for Rangiora that is located within walking distance or 800m of the Rangiora Town Centre. Kāinga Ora supports Submission #46<sup>3</sup> which seeks an increased height limit surrounding the Town Centre Zone (TCZ) to better provide for denser residential development within a walkable catchment (at least 4 storeys).

#### 4. PLANNING FRAMEWORK AND POLICY CONTEXT

- 4.1 As Variation 1 to the Waimakariri District Plan is an Intensification Planning Instrument, of particular relevance is the statutory context created by the NPS-UD and the directive requirements under the Resource Management Act 1991 (RMA) as amended by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (Amendment Act). This includes Schedule 3A objectives and policies relating to requirements for intensification. I set out the relevant NPS-UD objectives and policies in the following section for ease of reference.

##### NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT 2020

- 4.2 The NPS-UD provides national direction under the RMA and intends to improve the responsiveness and competitiveness of land and development markets. It requires local authorities to open up more development capacity, so more homes can be built in response to demand.
- 4.3 Objectives of the NPS-UD of particular relevant to V1 to the PDP from an urban design perspective include (my emphasis added):

**Objective 1:** *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety, now and into the future.*

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<sup>2</sup> Doncaster Development Limited

<sup>3</sup> Waka Kotahi NZTA

**Objective 3:** *Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*

- (a) *The area is in or near a centre zone or other area with many employment opportunities;*
- (b) *The area is well-serviced by existing or planned public transport; and,*
- (c) *There is high demand for housing or for business land in the area, relative to other areas within the urban environment.*

**Objective 8: New Zealand's urban environments:**

- (a) *Support reductions in greenhouse gas emissions.*

4.4 Policies associated with the NPS-UD which are particularly relevant to V1 from an urban design perspective include (my emphasis added):

**Policy 1:** *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

- (a) *Have or enable a variety of homes that:*
  - (i) *Meet the needs, in terms of type, price, and location, of different households ...*
- (b) *Have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (e) *Supports reductions in greenhouse gas emissions.*

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

- (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.

**Policy 4:** Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in this area.

**Policy 6:** When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:
  - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
  - (i) are not, of themselves, an adverse effect
- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)
- (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity
- (e) the likely current and future effects of climate change.

## **WAIMAKARIRI DISTRICT PLAN MEDIUM DENSITY RESIDENTIAL ZONE**

- 4.5 Kāinga Ora are supportive of the areas identified for rezoning to MRZ with the exception to this being the amendments in relation to the Height Variation Control Area in close proximity to the Rangiora Town Centre.
- 4.6 The intention of the Medium Density Residential Zone is to enable a range of low-rise apartments, terrace housing and multi-unit developments as envisaged by the strategic objectives and policies of the NPS-UD and Amendment Act.

## **5. RECOMMENDATIONS IN S42A REPORT AND RESPONSE**

### **HEIGHT VARIATION CONTROL AREA**

- 5.1 As outlined earlier, Kāinga Ora seeks greater residential intensification in and around the Rangiora Town Centre in accordance with the NPS-UD in achieving a more compact urban form within the existing urban area. This is sought through the inclusion of a Height Variation Control Area (**HVCA**) which would allow for residential buildings up to 19m in height, or five storeys. This approach is considered to be commensurate with the level of commercial activity provided for and enabled within the Rangiora Town Centre Zone. An uplift in zoning of this area from medium to high density residential was not sought, as the requested HVCA coupled with the density of urban form proposed was considered by Kāinga Ora to be commensurate with the level of commercial activity and services provided for and enabled within the TCZ as applied to Rangiora. Rangiora is observed as providing less than other town centres within Greater Christchurch.
- 5.2 As outlined earlier, the further submission of Waka Kotahi NZTA (#46<sup>4</sup>) seeks an increased height limit surrounding the TCZ to better provide for denser residential development within a walkable catchment (at least 4 storeys) and this is supported by Kāinga Ora.
- 5.3 The s42A report does not specifically address the Kāinga Ora submission on the HVCA. However, Section 6.3 of the s42A report considers the effects of a 11m/three storey development, with a

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<sup>4</sup> Waka Kotahi NZTA

particular focus on shading and loss of sunlight. As a result of both an evaluation undertaken by the reporting officer Mr Wilson and an assessment of the effects of sunlight and shading undertaken by Mr McIndoe (Urban Design) Mr Wilson recommends that the MRZ built form standard (BFS4) relating to height is changed so that buildings do not exceed 8 metres in height (+1m for a roof). This is proposed by way of a Qualifying Matter (**QM**) and would apply to the V1 MDRS area.

5.4 From an Urban Design perspective, I consider that the proposed QM raises a number of shortcomings, as follows:

- (a) Little or no consideration has been given to the overarching intent of the NPS-UD in achieving intensification in tier 1 urban environments. I agree with Mr Wilson (and Mr McIndoe) that there will be some additional loss of sunlight as a result of a three storey development. However, some change in amenity outcomes is anticipated with a policy focus on future **anticipated** built form outcomes (and noting that the recession plane provisions were revised based on submissions on the Bill in relation to impacts in the Christchurch context – see the evidence of Mr Neville). This framework does not preclude consideration of shading and loss of sunlight however Policy 3 and 6(b) clearly signals a step change in development patterns that are required to be reflected in plan provisions. The s42A report and supporting evidence does not consider what would be a reasonable outcome within a higher density environment and including in the context of a broader view on housing outcomes that align with a well-functioning urban environment.
- (b) I consider that the assumption in relation to the extent of loss of sunlight (up to 70%) is overstated. The extent of shading will be heavily dependent on design features, such as roof forms, gaps in the built form and individual site characteristics and context.
- (c) There does not appear to be any consideration to the subdivision of lots as part of the consideration of development

capacity and average unit sizes. I will leave Mr Heath to comment further on this matter from an economic and affordability perspective.

5.5 In passing, I note that the introduction of a QM for height has not been reflected in an update to the relevant Plan policies.

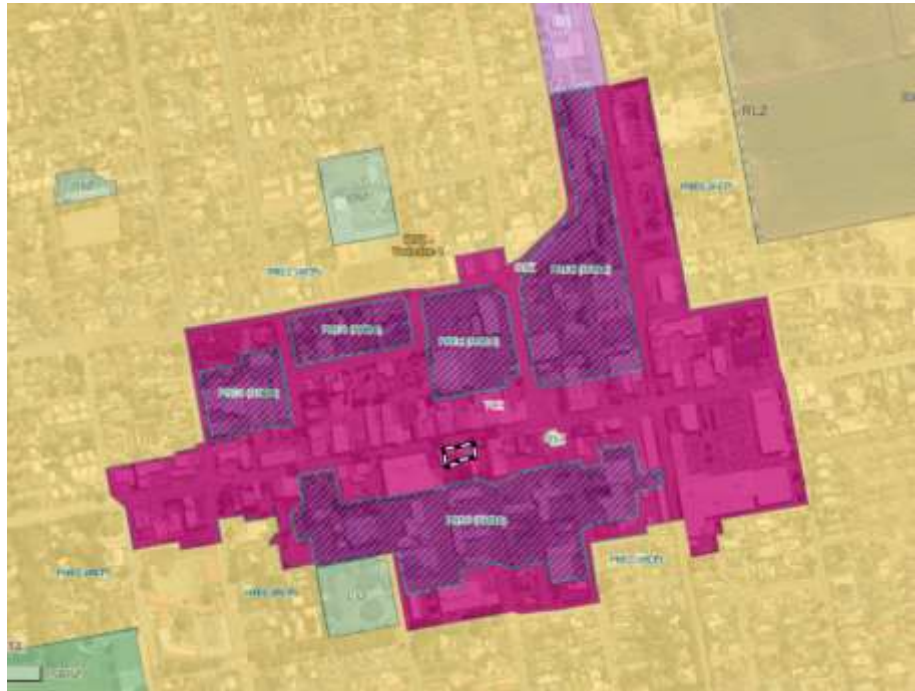
5.6 In addition to my concerns around sunlight access limiting higher density, taller buildings in Rangiora, I set out below my rationale for increased building heights and density around the town centre, drawing upon the Kāinga Ora submission points in relation to a HVCA and in response to the application of NPS-UD Policies 1, 3(d) and 6(b), as follows:

- (a) Rangiora Town Centre is identified as the primary centre for the District in the District Plan, comprising a full range of commercial, retail, community, medical, hospitality, education and public open spaces. These services meet the needs of the immediate and wider community, including a wide range of demographic groups.
- (b) Rangiora is anticipated to continue to grow and is intended to include the greatest range of commercial and community services in the District over the longer term.
- (c) The population of Rangiora is expected to continue to increase and result in increased demand for business floorspace.
- (d) The town includes a local bus service which focuses on connections with adjoining towns and Christchurch (rather than connections within the township). This includes regular and express bus services that provide access to and from Christchurch central city and other major employment centres such as Papanui and Christchurch Airport. The Town Centre is also highly accessible for most residents given the overall urban form and layout of the town, comprising largely a grid pattern.

(e) The range of services and amenities within the Town Centre is reflective of Rangiora being a Key Activity Centre (**KAC**) in the Regional Policy Statement (**RPS**), and more recently it has been identified as a 'Priority Development Area' under the Greater Christchurch Spatial Plan.

5.7 Given the Town Centre is highly accessible and walking and cycling trips to and from the centre are possible particularly given the grid pattern of the town (with the exception being the railway corridor which acts as a barrier to some east/west movements and its overall compact urban form). I consider that it is well suited to more intensive residential typologies, and in contribution to a reduction in greenhouse gas emissions associated with the transport sector.

5.8 In terms of town centre context (and in turning to urban form matters), Kāinga Ora seek a 18m height limit within the TCZ and I concur with this position. The hatched areas within the TCZ (see **Figure 2**) comprises the Residential Height Bonus Area Precinct (**PREC RHBA**) and this is recommended to include a height limit of 21m / 6 storeys as set out in the Council's s42A report, where at least one floor is required to be residential in use. If this is not included then 18m is the default height limit. Kāinga Ora supports this approach in encouraging additional height and residential use within the TCZ, and I also concur with that position.



*Figure 2: Snip from the ePlan outlining the extent of Town Centre Zone (dark pink) and the Residential Height Bonus Area Precinct (purple colour) (Source: Waimakariri Proposed District Plan ePlan)*

- 5.9 Turning to the MRZ, this includes the whole extent of the residential area of the township, extending from the edge of the TCZ to the outer extent of the township. This area includes a 11m height limit (plus 1m roof) as per the MDRS albeit this is now recommended to be 8+1m as per the s42A report. The spatial extent of the proposed HVCA requested by Kāinga Ora would align with a 800m walkable catchment out from the TCZ (see **Figure 1** earlier in my evidence). In order to achieve the required density uplift around the Town Centre Kāinga Ora recommended the HVCA be supported by a proposed height of 19 metres.
- 5.10 It is acknowledged that the submission process was constrained for time and as a result the previous Medium Density Residential zone boundary was a logical area for considering additional height. As such, further consideration has been given to the extent of the HVCA and the height limit adjoining the TCZ and what a commensurate height would be for the level of commercial activity and community services

anticipated (including the anticipated level of those services up to 30 years into the future).

- 5.11 I consider that an 18m height limit (rather than 19m) is sufficient within the HVCA. I consider that a 18m or 4-5 storeys<sup>5</sup> is appropriate and will provide the opportunity to enable a change in built form as anticipated by the NPS-UD.
- 5.12 I consider that the area where the 18m height limit would apply is too extensive and a tighter, more targeted walkable catchment is appropriate in the Rangiora context. In coming to this position I have visited the town and undertaken a more detailed on the ground analysis based on the actual road network distance and physical barriers. This process has identified a number of distinct characteristics and influencing factors and as a result a more accurate pedestrian shed<sup>6</sup> (more alignment with actual walking distances than a theoretical 'as the crow flies' approach).
- 5.13 I set out the influencing factors below:
- (a) Although Rangiora is the principle commercial centre within the District and includes a combination of both commercial and community services in comparison to other urban areas and a KAC, its standalone nature is of relevance when comparing the urban form of other KAC's in Greater Christchurch. This has a bearing on the achieving a logical urban form and a transition of scales of development in comparison to a suburban centre located within the context of a wider urban form.
  - (b) The nature and extent of the town centre itself including the TCZ requires consideration. Given the layout of the town centre (linear in nature) and the extent of the TCZ itself, it is relevant to identify a central point to base the walking distance analysis from (rather than the edge of the zone). Given the makeup of the town centre, the Farmers Department Store at

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<sup>5</sup> Assumption that each floor has a 3.5m floor to floor height.

<sup>6</sup> A pedestrian shed (ped shed) defines the pedestrian catchment of a located related to the walking distance to or from a destination rather than a radius from a centre point – source [www.placechangers.co.uk](http://www.placechangers.co.uk)

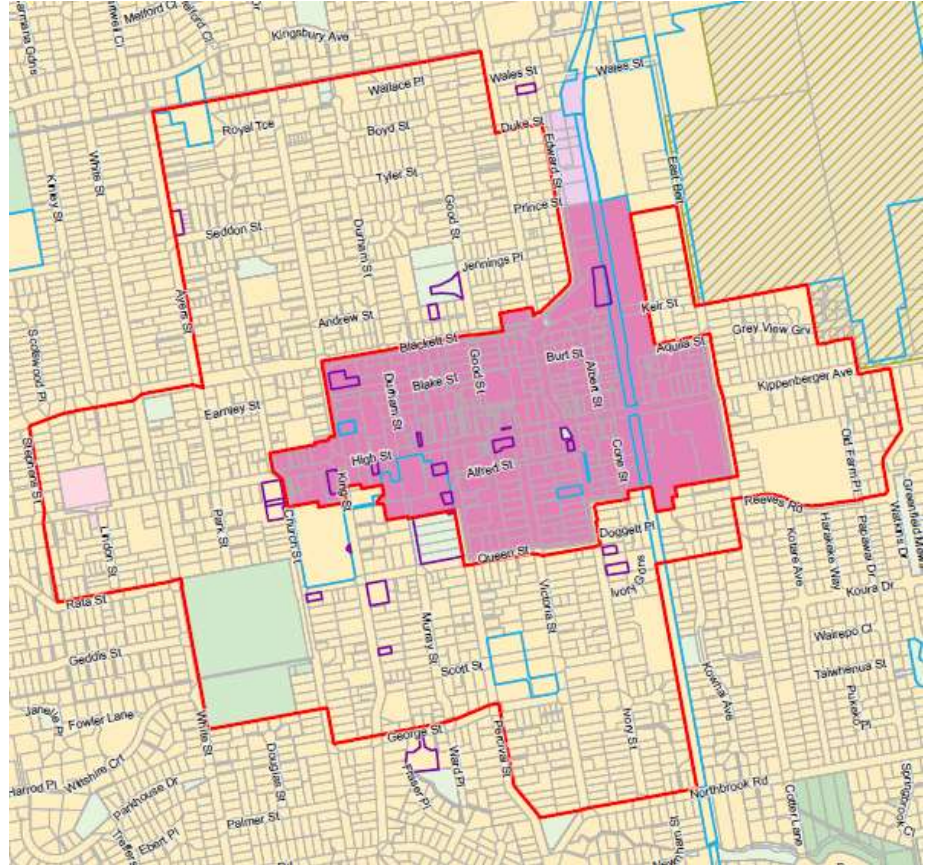
the centre of High Street is a key destination and is considered an appropriate orientating point. This is located immediately adjacent to the Council and adjoining other key retail outlets.

- (c) Accessibility is influenced by environmental factors that can impact on the desirability of walking and cycling. These can impact perceptions of walking distances and how far someone is willing to travel. Micromobility is also enabling people to travel further. Of relevance in Rangiora are the following:
- (i) The grid pattern which enables direct routes to and from the town centre in the north/ south direction and an ease of access and a clear line of sight of the town centre.
  - (ii) Activities that aligns with routes, which can encourage people to feel more comfortable on route or for the route to be more desirable.
  - (iii) Green space, although potentially providing for an off-road route, can be a barrier to access particularly after dark from a safety perspective.
  - (iv) The drain and walkway to the south of Kingsbury Avenue, which forms a natural barrier in the northern area of the town providing a logical delineation for a change in building height.
  - (v) The railway line which is a barrier to accessibility in the east /west direction and with limited crossings over the railway line. This makes access to the town centre from the southeast more challenging. The southwest neighbourhood also includes more cul-de-sacs constraining access.

5.14 Given the above, I have recommended a revised spatial extent of the HVCA and this is set out in **Figure 3**. The area has been ground truthed. Where possible, it aligns with natural boundaries such as key roads and



open spaces rather than the transition occurring mid-block, but that is not possible in all instances.



**Figure 3:** Revised spatial extent of HVCA (see also Appendix 2 for a larger scale version)

- 5.15 I consider that this revised boundary will achieve a more focused area for intensification and higher buildings in the future more immediately adjoining the town centre. It will enable an efficient use of land within the existing urban area and will support the ongoing economic vitality of the existing town centre. **Figure 4** also outlines the HVCA in the context of the wider residential area and the overall township utilising Google Earth. This highlights the more focused, compact area directly adjoining the TCZ.



**Figure 4:** *Spatial extent of the HVCA in the context of the wider residential zone and township (Source: Google Earth / Boffa Miskell).*

- 5.16 From an urban design perspective, the HVCA will enable a transition in the scale and form of development (stepping down) as you move away from the centre of town to the wider MRZ. It will result in building heights located away from the High Street, factoring in the traditional smaller scale/finer grain footprints that are a valued characteristic of the town. It will also avoid an interface between sites that utilise the Height Bonus tool and a 21m building and with a 12 metre residential property provided for under the MDRS. I note that this 'transition' in urban form will be further compromised if there is a reduction in height to 8+1m as a result of the sunlight QM (i.e. potentially 21m to 8m).
- 5.17 The combination of a 18m height limit and revised spatial extent is considered commensurate with the level of commercial activity and services provided for and anticipated within the Rangiora TCZ. I consider that it is more reflective of the overall size of the town, the extent of the overall residential area and what can be reasonably expected in terms of commercial activities and services associated with its size.

- 5.18 The HVCA will assist to reinforce the primacy of the town centre and will achieve a logical urban form strategy to support the town centre, public transport and other economic growth factors in the longer term. I consider that this revised urban form with an increased height and intensity in closest proximity to the town centre aligns with the anticipated role and function of Rangiora in the future (rather than the wider MDRS area).
- 5.19 The HVCA will enable a greater range of housing typologies and housing choice in the future. It will encourage higher density residential opportunities and a greater intensity of use immediately adjacent to the town centre and an optimal spatial arrangement. This will be attractive to those that want convenient access to the town centre.
- 5.20 Where the height increase area immediately adjoins the standard MRZ (11 +1 for roof) then the height in relation to boundary rule would still apply to deal with shading and visual dominance.
- 5.21 In summary, I consider that a greater level of residential intensification immediately adjoining the TCZ will better align with the relevant NPS-UD policies<sup>7</sup> with some loss of sunlight being acceptable in achieving a step change in development patterns. It will provide a more efficient, optimal spatial arrangement/urban form and maximise the opportunities of the area of the township, which is the most accessible, including in relation to the use of public transport and active travel.
- 5.22 As such, I recommend that a change is made to the relevant policies and standards<sup>8</sup> to allow greater height in a defined area adjacent to the Town Centre Zone.

#### **MATTERS OF DISCRETION**

- 5.23 The Matters of Discretion for MDRS are set out under RES-MD2 (see Appendix 3). As notified, these matters apply to 3 or more residential units (and a range of other built form standard breaches). The Kāinga Ora submission is set out in detail in Appendix 4 and the key issues identified by Kāinga Ora in opposing the Matters identified were:

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<sup>7</sup> Policy 3(b) and 6(b) NPS-UD

<sup>8</sup> Policy RES-P15, Policy MRZ-01, MRZ-BFS4 Height

### **Extent and Scope of Matters –**

- (a) The extent of the Matters (30 overall) and the broad nature of the Matters.
- (b) That development is required to achieve all of the principles, (noting that not aligning with all the matters does not equate to achieving a good urban design outcome).

### **Anticipated Context –**

- (c) The matters do not capture the anticipated future context and are inconsistent with the NPS-UD and the Amendment Act, which focus on changes to amenity values as development occurs and including providing for a range of housing typologies.

### **Design Principles vs Assessment Matters –**

- (d) The structure of the RES-MD2 Residential Design Principles is confusing, comprising both 'principles', and a number of 'relevant considerations'.
- (e) There are overlaps between the residential design principles and other matters of discretion applicable to a breach of the built form standards.

5.24 The s42A report does not specifically address the Kāinga Ora submission point relating to the matters of discretion. I consider that, from an urban design perspective, a more concise and succinct list of assessment matters would be more workable and better align with the Amendment Act in facilitating more housing opportunities. I also consider that rewording of a number of the matters will avoid confusion or ambiguity.

5.25 Given the nature of assessment matters as a tool to assess a proposal by way of the preparation of an Urban Design assessment this means that not all matters may be relevant, and there should not be a requirement for all matters to be considered. It is not a rule/tick box

exercise, but a tool for assessing a proposal. It is possible that a better urban design outcome is achieved by placing greater emphasis on one matter over another, or not addressing some matters, given local context and considerations. Therefore, a proposal must be assessed 'in the round' rather than as a box ticking exercise. I also note that part of the enablement under the Amendment Act is a restricted discretionary activity status whereby it is anticipated that not all matters will be relevant to assess (i.e. not full discretionary activity status).

5.26 Kāinga Ora recommended the following matters of discretion (or something similar) in its submission:

1. *The scale and form of the development is compatible with the planned urban built form of the neighbourhood.*
2. *The development contributes to a safe and attractive public realm and streetscape.*
3. *The extent and effects on the three waters infrastructure, achieved by demonstrating that at the point of connection the infrastructure has the capacity to service the development.*
4. *The degree to which the development delivers quality on-site amenity and occupant privacy that is appropriate for its scale.*

5.27 I consider that some additional detail is required to provide clarity around the outcomes sought.

5.28 The following matters of discretion are recommended, noting that these will relate to a development of 4 or more units ranging in height from 11m plus 1m roof through to 18m (and not other built form standards as covered in Ms Dale's evidence). I consider that this refined, shorter list will provide an appropriate level of assessment of a design proposal and that will ensure a good outcome is achieved.

1. *The scale and form of the development is compatible with the planned urban built form of the neighbourhood and will provide visual interest. This includes a variety of building forms,*

*articulation and materials to avoid overly lengthy or continuous rooflines and monolithic forms.*

2. *Development that contributes to a safe and attractive public realm and streetscape. This includes the provision of landscape and the orientation of building frontages to face the street and open spaces, avoiding street facing facades dominated by garages.*
3. *Development delivers quality on-site amenity and occupant privacy that is appropriate for its scale. This includes provision of planting including on site boundaries and accessways and creation of usable and attractive outdoor living spaces.*
4. *Provision of pedestrian and vehicle access and integration of parking (where relevant) in a way that does not dominate the development, particularly when viewed from the street or other public open spaces.*
5. *Provision of suitable storage and service spaces which are conveniently accessible, safe and/or secure and which are screened from the street or other public open space.*
6. *Crime Prevention through Environmental Design (CPTED) and the delivery of a safe environment for both occupants and users of any adjacent streets or public open areas.*

## **6. CONCLUSION**

6.1 Kāinga Ora have sought amendments to enable a greater height limit in an identified area adjoining Rangiora Town Centre along with changes to the assessment matters for the MRZ.

6.2 I have considered the amendments sought by Kāinga Ora and recommend a refinement to the boundary of the HVCA to better reflect a 800m or 10 minute walk in Rangiora. I also consider that an 18m height limit is sufficient to achieve the outcomes sought for the HVCA. I do not consider that the proposed sunlight QM adequately considers

the future built form outcomes anticipated or step change in development patterns required.

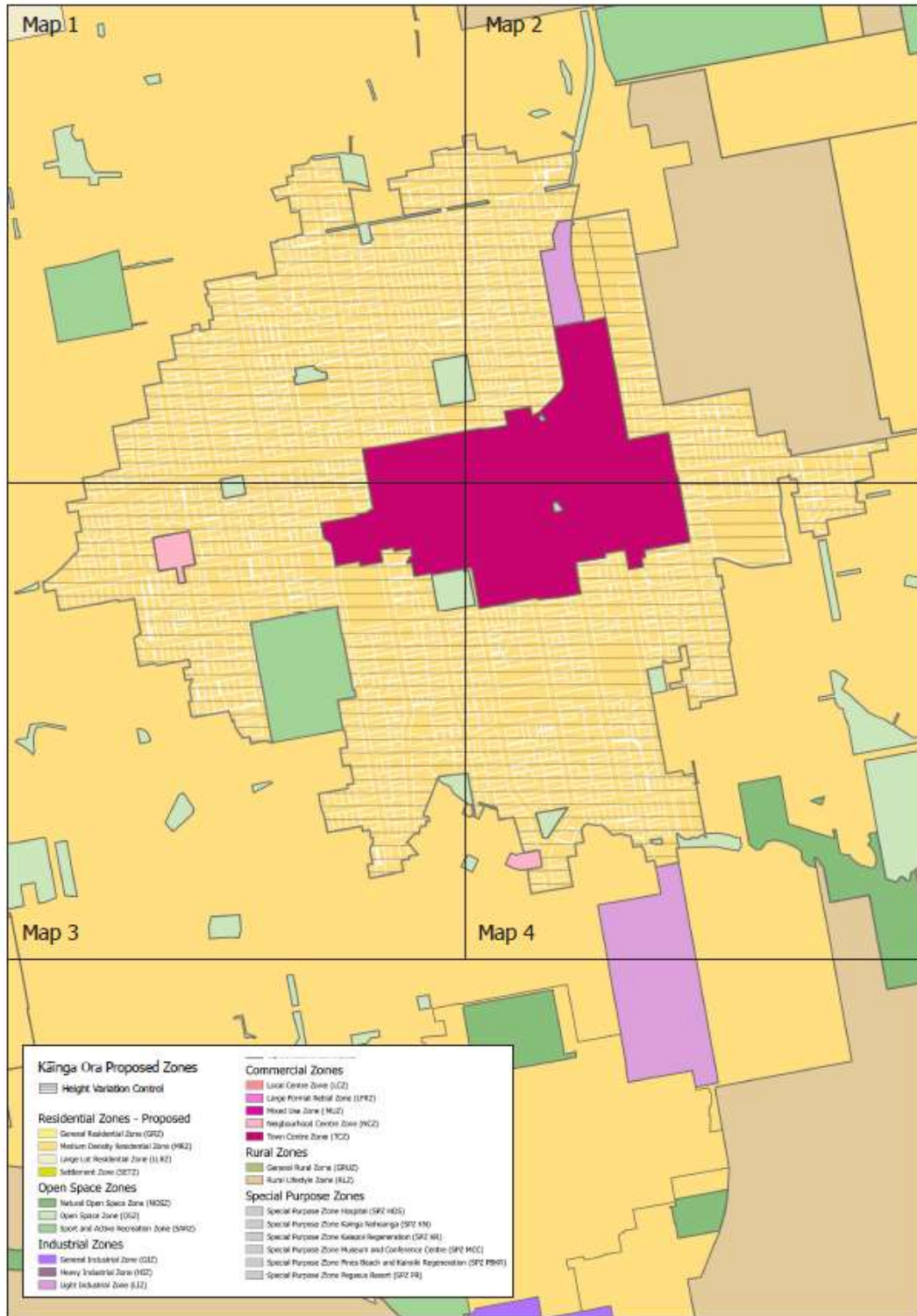
- 6.3 I recommend amendments to the assessment matters to strike an appropriate balance between flexibility of design, enabling opportunities and change to provide for higher density housing typologies in the context of achieving a well-functioning urban environment.



**Jane Rennie**

**11 September 2024**

**Appendix 1: Height Variation Control Area (as included in Submission 80)**

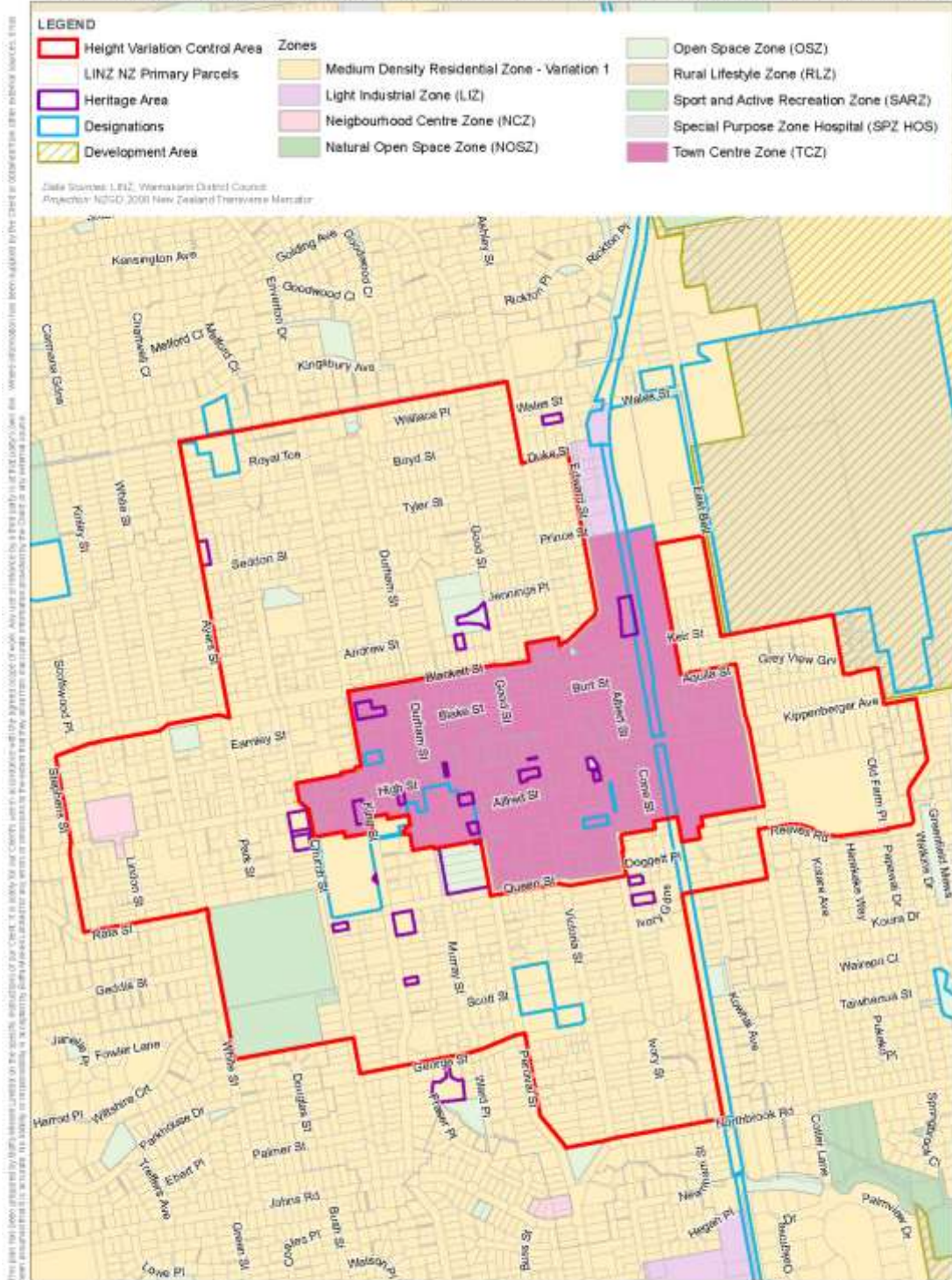


Rangiora - Kāinga Ora Proposed Zones



## Appendix 2: Revised Boundary for the HVCA

File Ref: bfm\kfr\1\WAT\_design\3\2023\BM220780\_1Re\_Kainga\_Cha\_ID\_Advice\_Waimak\_District\_Plan\GIS\BM220780.aprx BM220780\_Height\_Variation\_Control\_Area\_4AP\_2.02.pn



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**KĀINGA ORA UD ADVICE WAIMAKARIRI DISTRICT PLAN**  
Height Variation Control Area  
Date: 03 September 2024 | Revision: 1  
Plan prepared for Kāinga Ora by Boffa Miskell Limited  
Project Manager: Jane Rennie@boffamiskell.co.nz | Drawn: Lia | Checked: JRe

Map 1

### Appendix 3: RES-MD2: Residential Design Principles (as notified)

1. **Context and character:**
  - a. The extent to which the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.
  - b. The relevant considerations are the extent to which the development:
    - i. includes, where relevant, reference to the patterns of development in and/or anticipated for the surrounding area such as [building](#) dimensions, forms, [setback](#) and alignments, and secondarily materials, design features and tree plantings; and
    - ii. retains or adapts features of the [site](#) that contribute significantly to local neighbourhood character, potentially including existing [historic heritage](#) items, [Sites](#) of Ngāi Tahu Cultural Significance shown on the planning map, [site](#) contours and mature trees.
2. **Relationship to the street and public open spaces:**
  - a. Whether the development engages with and contributes to adjacent streets, and any other adjacent public open spaces to contribute to them being lively, safe and attractive.
  - b. The relevant considerations are the extent to which the development:
    - i. orientates [building](#) frontages including entrances and windows to habitable rooms toward the street and adjacent public open spaces;
    - ii. designs [buildings](#) on corner [sites](#) to emphasise the corner;
    - iii. needs to minimise south-facing glazing to minimise heat loss; and
    - iv. avoids street façades that are blank or dominated by garages.
3. **Built form and appearance:**
  - a. The extent to which the development is designed to minimise the visual bulk of the [buildings](#) and provide visual interest.
  - b. The relevant considerations are the extent to which the development:
    - i. divides or otherwise separates unusually long or bulky [building](#) forms and limits the length of continuous rooflines;
    - ii. utilises variety of [building](#) form and/or variation in the alignment and placement of [buildings](#) to avoid monotony;
    - iii. avoids blank elevations and façades dominated by garage doors; and
    - iv. achieves visual interest and a sense of human scale through the use of architectural detailing, glazing and variation of materials.
4. **Residential amenity:**
  - a. In relation to the built form and residential amenity of the development on the [site](#) (i.e. the overall [site](#) prior to the development), the extent to which the development provides a high level of internal and external residential amenity for occupants and neighbours.
  - b. The relevant considerations are the extent to which the development:
    - i. provides for outlook, sunlight and privacy through the [site](#) layout, and orientation and internal layout of [residential units](#);
    - ii. directly connects private outdoor spaces to the living spaces within the [residential units](#);
    - iii. ensures any communal private open spaces are [accessible](#), usable and attractive for the residents of the [residential units](#); and

- iv. includes tree and garden planting particularly relating to the street frontage, boundaries, [accessways](#), and [parking areas](#).

**5. Access, parking and servicing:**

- a. The extent to which the development provides for good access and integration of space for parking and servicing.
- b. The relevant considerations are the extent to which the development:
  - i. integrates access in a way that is safe for all users, and offers convenient access for pedestrians to the street, any nearby parks or other public recreation spaces;
  - ii. provides for [parking areas](#) and garages in a way that does not dominate the development, particularly when viewed from the street or other public open spaces; and
  - iii. provides for suitable storage and service spaces which are conveniently [accessible](#), safe and/or secure, and located and/or designed to minimise adverse [effects](#) on occupants, neighbours and public spaces.

**6. Safety:**

- a. The extent to which the development incorporates [CPTED](#) principles as required to achieve a safe, secure [environment](#).
- b. The relevant considerations are the extent to which the development:
  - i. provides for views over, and passive surveillance of, adjacent public and [publicly accessible spaces](#);
  - ii. clearly demarcates boundaries of public and private space;
  - iii. makes pedestrian entrances and routes readily recognisable; and
  - iv. provides for good visibility with clear sightlines and effective lighting.

#### Appendix 4: Kāinga Ora Submission and Relief Sought (Submission #80)

Reasons for Submission	Relief Sought
<p>Kāinga Ora oppose <b>RES-MD2</b> as notified.</p> <p>Kāinga Ora's seek more concise/ succinct matters of discretion that are clear, easily understood, clearly state the outcomes intended, and provide for design innovation and choice.</p> <p>The proposed assessment matters in rule MRZ - MD2 specify nearly 30 individual matters. The scope and extent of these assessment matters provide such broad discretion that they undermine the 'Housing Supply Act's' intent of a restricted discretionary activity status.</p> <p>Kāinga Ora supports nationally consistent matters of discretion for MDRS standards, whilst allowing for some evidence based local context nuances. In particular, Kāinga Ora supports the use of consistent 'Urban Design Principles' in District Plans throughout the country.</p> <p>Kāinga Ora recommend the matters are reworded to capture the anticipated context (rather than the receiving environment) in line with the 'Housing Supply Act' and NPS-UD and changes to the proposed matters of discretion to sufficiently address the likely changes to amenity values while providing for a range of housing typologies.</p> <p>The matters seem particularly onerous when applied to a single residential unit with a single boundary setback noncompliance. Noting that a number of the 'boundary' standards list this as a RD matter. RES-MD2 was clearly intended to apply to scenarios where 4 or more units are proposed.</p> <p>The structure of the RES-MD2 Residential Design Principles is confusing. In each of the 6 design principles, there appears to be a sentence outlining the principle, and then specific assessment matters under each of these sentences. Considering these are assessment matters, having six overarching design principles is not necessary.</p> <p>There also appears to be an overlap between the residential design principles and other matters of discretion, it is recommended that the assessment matters be consolidated to avoid duplication.</p>	<p><b>Delete RES-MD2 as notified.</b></p> <p>Amend the matters of discretion to:</p> <ul style="list-style-type: none"> <li>- Reflect the intent of the 'Housing Supply Act' and 'NPS-UD',</li> <li>- Clearly state the outcomes intended, and provide for design innovation and choice,</li> <li>- Achieve nationally consistent UDP MD's (as suggested below),</li> <li>- Apply only to the development of four or more units,</li> <li>- Reflect the anticipated context rather than the receiving environment,</li> <li>- Reduce the number of matters to 5- 6, and</li> <li>- Avoid duplication with other matters of discretion applying to MRZ.</li> </ul> <p>Kāinga Ora seeks amendments to the matters of discretion, similar or same, to the matters listed below:</p> <ol style="list-style-type: none"> <li>1. <i>The scale and form of the development is compatible with the planned urban built form of the neighbourhood</i></li> <li>2. <i>The development contributes to a safe and attractive public realm and streetscape.</i></li> <li>3. <i>The extent and effects on the three waters infrastructure, achieved by demonstrating that at the point of connection the infrastructure has the capacity to service the development.</i></li> <li>4. <i>The degree to which the development delivers quality on-site amenity and occupant privacy that is appropriate for its scale.</i></li> </ol>

