

To: Damon Mathfield – Rotorua Lakes Council

From: Cam Wallace – Barker & Associates Limited

Date: 27 June 2022

Re: Plan Change 9 – Development Standards and related provisions – Urban Design Considerations

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## 1.0 Introduction

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The purpose of this memo is to identify relevant urban design considerations that should be considered as part of the development of Plan Change 9 to the Rotorua District Plan. The purpose of Plan Change 9 is to give effect to the Resource Management (Enabling Housing Supply & Other Matters) Amendment Act 2021 (**the Amendment Act**), the relevant provisions of the National Policy Statement on Urban Development and help address growing housing issues within Rotorua.

This memo includes considerations of urban design matters related to the provisions of chapters covering:

- Residential zones;
- Commercial zones;
- Subdivision.

## 2.0 Planning Context

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The Amendment Act 2021 is designed to improve housing supply in New Zealand's five largest cities by speeding up implementation of the National Policy Statement on Urban Development (**NPS-UD**) and enabling more medium density homes. Rotorua has been identified as an area of acute housing need and therefore it is now considered a "specified territorial authority" under the Act. Under the new s77G of the RMA specified territorial authorities will be required to amend the district plan to:

- give effect to Policy 5 of the NPS-UD;
- Ensure every relevant residential zone incorporates the Medium Density Residential Zone Standard (MDRS).; and
- Include the objectives and policies set out in clause 6 of Schedule 3A.

Within the Rotorua Lakes District Plan the "relevant residential zones" where the MDRS must be applied include the Residential 1 and 2 zones. Within clause 6, objectives and policies of particular relevance to urban design include (my *emphasis* added):

Objective 2 - a relevant residential zone provides for a variety of housing types and sizes that respond to—

- (i) housing needs and demand; and
- (ii) the neighbourhood's *planned urban built character*, including 3-storey buildings

Policy 1 - enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments

Policy 3 - encourage development to *achieve attractive and safe streets and public open spaces*, including by providing for passive surveillance:

Policy 4 - enable housing to be designed to meet the *day-to-day needs* of residents

Policy 5 - provide for developments not meeting permitted activity status, while encouraging *high-quality developments*

The medium density residential standards (**MDRS**) include seven core standards to enable development. These standards are intended to enable landowners to build up to three houses of up to three storeys on their site as of right on most sites with greater density enabled as a restricted discretionary activity. The MDRS are summarised as follows:

- Density: 1-3 dwellings per site – permitted and 4 or more dwellings – restricted discretionary.
- Height: 11m (with provision for up to additional 1m to enable pitched roof forms).
- Height in Relation to Boundary: 4m + 60 degrees (does not apply to common walls).
- Maximum Building Coverage: 50% of the net site area
- Minimum landscaping: A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site. May be located on any part of the development site, and does not need to be associated with each residential unit.
- Front yard: 1.5m Yards (Side and Rear)/ 1m (excluded on corner sites)
- Dwellings Fronting the Street: Any residential unit facing the street must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.
- Outdoor Living Space - Residential Unit at ground floor: Must have outdoor living space:
  - Minimum 20m<sup>2</sup> area:
  - where located at ground level has no dimension less than 3m and where provided in the form of a balcony, patio, or roof terrace, is at least 8 square metres and has a minimum dimension of 1.8 metres.
  - May be grouped cumulatively in 1 communally accessible location or located directly adjacent to the unit.
- Outdoor Living Space Residential Unit above ground floor: Must have outdoor living space:
  - Minimum 8m<sup>2</sup> area with a minimum dimension of 1.8m.
  - May be grouped cumulatively in 1 communally accessible location or located directly adjacent to the unit.
- Outlook Space: Principal living room outlook 4m depth x 4m width. All other habitable rooms – outlook 1m depth x 1m width.

The above standards partially give effect to the mandatory policies as they relate to design matters. However, these standards are focussed on developments of 3 or less dwellings. With increased density on any given site there is an increase in design complexity where a range of competing interests around access,

privacy, and amenity need to be considered for future occupants and to a lesser extent surrounding properties.

### 3.0 Residential 1 Zone

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The MDRS are intended to apply to the existing Residential 1 zone which spans the majority of Rotorua's existing urban area. A review of the MDRS has highlighted some potential urban design issues which would require further refinement to the provisions to help deliver a high quality, attractive urban environment. These issues relate to:

- Visual dominance and off-site amenity effects;
- On-site amenity; and
- Streetscape interface.

To address these, refinements to the provisions including objectives, policies, development standards, and matters of discretion have been identified and are discussed below.

#### 3.1 Maximum building length

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New Zealand's predominant cadastral pattern is typically characterised by sites which are longer than they are wide. This pattern can be clearly seen across Rotorua. Longer sites in combination with narrower widths tends to generate buildings which extend a long way back from street frontages. This is reinforced by development standards such as side yards and HiRB which consistently apply over the length of a site. The increased height enabled by the MDRS in combination with other standards (including engineering standards around access and parking) has the potential to encourage a "wall" of development running perpendicular to the street. With higher buildings and the removal of density controls, this can result in a visually dominant built form that can affect the outlook of neighbouring sites; directs outlook over adjoining sites impacting on privacy and the amenity of existing residents reducing a person's enjoyment of that space; and can create a feeling of being closed in or contained.

Whilst people living in an urban environment can reasonably expect to see others – both in neighbouring dwellings/ private open spaces and in public places – this is generally in a more transient, incidental situation (i.e. someone walking past). The MDRS (combined with the predominant cadastral pattern) could promote a situation where dwellings are design to permanently orientate over neighbouring sites. The impact of this increases with height (above ground level) in combination with the overall density of development (refer to Figure 1). These issues are potentially further exacerbated in the event neighbouring sites are developed under similar circumstances.

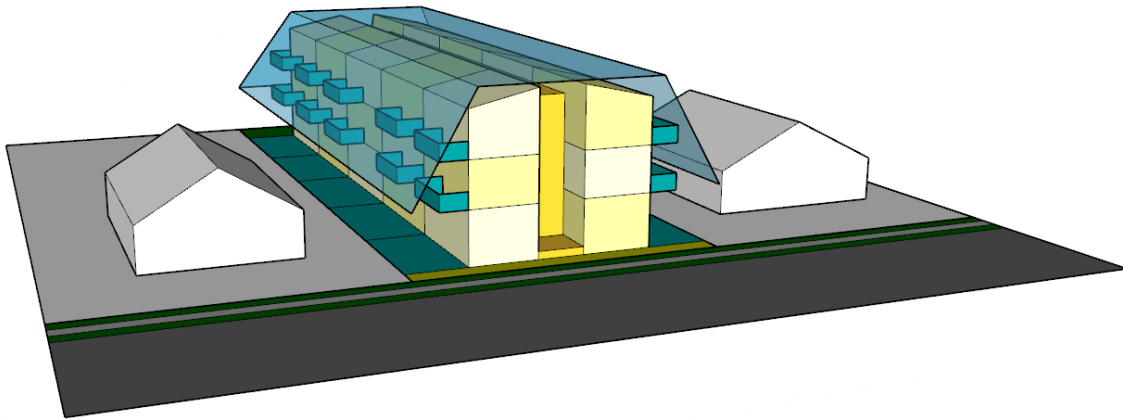


**Figure 1 - Modelled walk-up apartment building compliant with all development standards except for glazing to the street**

To address the above, it is considered that there would be merit in introducing a maximum building length control above ground level<sup>1</sup>. There are a number of urban design benefits that a building length control could provide and adverse effects that it could manage. These include

- Limits the potential for adverse visual dominance impacts resulting from the ‘wall’ effect that long, low and uninterrupted building elevations perpendicular to the street can have on adjoining sites;
- Potentially encourages a greater proportion of dwellings to maximise their outlook over the street and internally towards the rear, rather than over neighbouring properties to the side;
- Allows for daylight and/ or sunlight penetration into new buildings at each end enhancing internal amenity for future residents;
- Allows for improved daylight and/ or sunlight penetration through to adjoining sites; and
- Encourages more meaningful/ functional areas of open space (private or communal) that can cater for increased on-site amenity.

Maximum building lengths of between 15m and 30m are currently in operation within district plans for Dunedin, Tauranga, Gisborne, Queenstown and New Plymouth councils. 22m has been modelled and is recommended to apply as measured perpendicular to the street only with a 4m gap between buildings, above ground floor level. This would allow ‘back-to-back’ type apartment development on a site to occur and enable living spaces at each end of the buildings to access natural light. The 4m gap aligns with the required outlook depth from principal living spaces and whilst exceeding the 3m minimum dimension for ground floor living space would likely be well aligned with probably dimensions of such spaces to meet the 20m<sup>2</sup> minimum area. As such, the building length standard could complement existing standards and ensure a degree of efficiency in overall site configuration.

8m is generally regarded as an ideal preferred depth for single aspect units (but increased depth can be suitable in instances where higher floor-to-ceiling heights or greater areas of glazing are included). Placed back-to-back, this generates a building length of approximately 17-18m when taking into account the depth of external and internal walls. The additional length proposed is intended to provide a greater degree of

<sup>1</sup> At ground level, potential effects would be adequately addressed by boundary fencing and any proposed landscaping.

design flexibility including the ability to potentially accommodate an increase in the depth of units and/ or the presence by a common hallway or core area between units.

### 3.2 Minimum dwelling size

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The MDRS includes no standards relating to the size of dwellings. A minimum dwelling size standard is useful for ensuring that the smallest dwellings will provide reasonable conditions of function and amenity for its design occupancy. Minimums, if set at an appropriate level, will provide a degree of guidance to the development community over the potential yield on any given site which will also assist with long-term infrastructure planning. They can also provide assurance to the wider public around the likely form and typologies of dwellings which could be expected to occur across the district.

Minimum areas of 35m<sup>2</sup> for a studio dwelling and 45m<sup>2</sup> for one or more-bedroom dwelling are considered appropriate, in urban design terms, and broadly comparable with other towns and cities across New Zealand. For example:

- (a) Across residential and business zones, the Auckland Unitary Plan provides for minimum studio apartments sizes of between 30m<sup>2</sup> and 35m<sup>2</sup>, and 45m<sup>2</sup> for one or more bedrooms;
- (b) The Palmerston North District Plan enables dwellings with minimum sizes of 45m<sup>2</sup> without any qualifiers relating to bedrooms within identified multi-unit housing areas;
- (c) The Christchurch District Plan enables studio units of 35m<sup>2</sup>, and 45m<sup>2</sup> for 1-bedroom units; and
- (d) Proposed Plan Change 26 of the Tauranga District Plan seeks to enable studio units of 35m<sup>2</sup>, and 45m<sup>2</sup> for 1-bedroom units.

Alignment with proximate territorial authorities is also considered beneficial as it provides a consistent standard across. This will provide greater certainty for the wider development community and an ability to deliver modular or standardised terraced and apartment typologies over a wider area. This avoids the need for bespoke internal designs depending on where development is occurring.

Whilst noting the that units lower than the recommended sizes can still provide appropriate living outcomes, as the internal area of a dwelling decreases greater care is required in terms of design and space planning to achieve a functional unit with sufficient amenity for occupants. As such, there is some merit in providing at least some minimum standards within the framework provided by a district plan.

### 3.3 Fencing

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Fencing, and to a lesser degree landscaping, can have a significant impact on the overall quality and functionality of development especially as viewed from the street or other public spaces. Ideally, fencing in front yards (if fencing is to be provided) needs to provide for both privacy for the front yard if it's a useable space and a visual connection to the street. Visual connections are important for enabling opportunities for passive surveillance. There is also a significant body of research in New Zealand and overseas which correlates lower fence heights along the street with real and perceived increases in personal safety. In order to support the mandatory Policy 3 which seeks to provide for passive surveillance it is considered that there would be a benefit in including fencing standards – particularly along the front boundary of a site – otherwise the primary purpose of the “windows facing street” standard is compromised. Figure 2 and 3 provide a comparison of the impacts of higher vs lower front fence heights and how they can contribute or detract from streetscape amenity and safety.

The following standards with relation to fences are recommended:

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(a) Maximum height within front yard or adjacent to a boundary with a public open space:

- (i) 1.2m; or
- (ii) 1.8m for no more than 50% of the site frontage and 1.2m for the remainder; or
- (iii) 1.8m if the fence is at least 50% visually open.

The above standard recognises the diversity of contextual factors which may impact on preferred fencing arrangements as well as providing for individual resident preferences. It ensures an appropriate level of visual connection is maintained between the street and a dwelling while giving flexibility and choice as to how high a front fence might be designed. In particular it provides for situations where the private open space for a dwelling may be required to be at the front of the dwelling (e.g. to take advantage of northern sun or significant view) and greater levels of privacy or security may be warranted. By allowing, and to an extent promoting variation in fence height, this standard may also discourage monotony and the visual dominance of street edges by solid high front fences which is seen particularly when they are installed on most or all frontages along a street (refer to Figure 2 below).



**Figure 2 – High street fencing on a medium density development (Te Atatu, Auckland)**



**Figure 3 – Low street fencing on a medium density development (Hobsonville, Auckland)**

### 3.4 Windows facing street

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The MDRS includes a rule requiring residential unit facing the street must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.

In urban design terms this is considered a generally positive rule that helps to address a real issue with more intensive development presenting a blank “side” to the street to achieve greater site efficiency within the constraints of New Zealand’s predominant cadastral pattern of sites which are longer than they are wide.

However, it is considered that inclusion of the standard as drafted has the potential to create unintended consequences in terms of privacy and the general quality of a development as viewed from the street.

The reference to doors to satisfy the standard may promote a situation where a ranch-slider is utilised as a “front door” to reduce the need to accommodate an additional opening for a more traditional opaque/ solid front door. This can create potential privacy and/ or security concerns with visibility into internal spaces. In urban design terms, fenestration is an important component of overall building articulation and attractive frontages. In addition, entranceways (including front doors) are also an important design technique to add interest to a building façade and aid in wayfinding. As such, there is value in enabling front doors (whether glazed or constructed from solid materials such as wood) to count towards meeting the 20% glazing requirement.

There should also be an additional explanation setting out that garage doors cannot be counted towards meeting this requirement. There are a number of modern plexi/ laminate glass garage door configurations available (refer to Figure 1 below) that due to their size could fulfill a large portion of the required 20% glazing.



**Figure 4 – Example of an opaque, plexi/ laminate glass garage door**

Secondly, the standard as drafted may encourage a proliferation of flat or hipped roofs fronting the street to reduce the area of façade fronting the street to reduce the extent of glazing required and associated costs. This could have impacts on the overall attractiveness of more intensive developments and from a neighbourhood perspective it provides for the potential for some roofscape diversity and avoid a visually monotony in built form outcomes. As the purpose of the standard relates primarily to promoting interaction with the street/ passive surveillance, it would be beneficial to exclude those portions of the façade associated with non-habitable roof space from the overall calculation requirements.

### 3.5 Design Guidance

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In addition to various changes to the development standards, a Residential Design Guide (**the Guidelines**) has been produced to provide more guidance on delivering quality intensification. This guide is intended to build on the Ministry for the Environment’s *National Medium Density Design Guide* which provides guidance on permitted levels of development under the MDRS. The focus of the Guidelines is on more intensive development (i.e. more than 4 dwellings) which are proposed to be required to go through a resource consent process.

The Guidelines have been developed as an educational tool for the community, applicants (and their design team) and Council officers around design principles and techniques which can be implemented to address common issues which can arise in the design of more intensive residential developments (e.g. on-site privacy or building bulk). Matters covered within the Guidelines are aligned with matters of discretion and assessment criteria within the District Plan.

## 4.0 Residential 2 Zone

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In addition to the application of the MDRS within the Residential 1 zone, accessibility and demand analysis undertaken has identified that some areas around the City Centre (e.g. Glenholme).

The proposed standards within the Residential 1 zone are generally well aligned with development within the Residential 2 zone as they support multi-unit development, including those configured in apartment type arrangements. However, there is a clear need to reconsider the heights and density of development enabled in this area due to its much higher levels of accessibility than can be measured across the wider Residential 1 zone. In my opinion, key issues to be considered relate to the height of development enabled.

#### 4.1 Maximum Height

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Generally speaking, the cost of construction greater than three storeys in New Zealand increases significantly due to structing engineering, circulation and fire standards. This also creates challenges with securing and servicing funding to enable more intensive development to occur.<sup>2</sup> With the application of the MDRS across the entire Residential 1 zone there is also likely to be significant competition in developable land. These factors, combined with higher levels of accessibility in and around Rotorua City Centre mean that a higher permitted building height would be appropriate. To address the above issues, a height limit of six storeys in the Residential 2 zone is considered appropriate. This will provide a transition in scale between the increased heights proposed in commercial zones with the Residential 1 zone and also provide an incentive for the development community to support greater levels of intensification.

In determining an appropriate height in metres equivalent to a six-storey residential building, a 19.5m height limit is proposed. This would enable six storeys with a floor-to-floor height of 3.1m (this would enable an internal floor-to-ceiling height of approximately 2.7m) and totaling 18.6m.<sup>3</sup> An additional allowance of 0.9m has also been included to accommodate sloping roof forms<sup>4</sup> and potential freeboard requirements in areas with some identified flooding issues.

The scale of a 19.5m high building is also proportionate to the scale of the street and the public realm that can be seen across the Residential 2 zone which features a typical width of 20.1m (one imperial chain). This could provide for a street enclosure ratio of 1:1 which is regard as a well-founded rule of thumb in urban design that balances spatial definition and a sense of openness. This difference with the Residential 1 zone could, over time, contribute to a more distinctive identity for central Rotorua and contribute to the overall legibility of the urban environment.

Additionally, matters of discretion signaling opportunities where increased height above and above permitted standards would be beneficial. This is particularly the case for large sites or those located on corners.

#### 4.2 Height in Relation to Boundary

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Compliance with HIRB standard of the MDRS is unlikely to deliver the expected higher intensity residential development anticipated in the Residential 2 zone. Sites within the proposed extent of the Residential 2 zone exhibit a historic subdivision pattern, whilst being relatively wide by New Zealand standards (over 20

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<sup>2</sup> Alternative housing models such as build-to-rent or community housing, as well as emerging construction technologies like light-weight structural timber may improve the feasibility of more intensive housing developments.

<sup>3</sup> 3m is generally regarded as the absolute minimum required to ensure sufficient internal floor-to-ceiling heights. Apartment schemes typically feature floor-to-floor heights of 3.1-3.2m while higher end developments can include floor-to-floor heights of up to 3.4m.

<sup>4</sup> Flat roofs still require a pitch of 3% - across a 12m wide building this equates to additional roof height of 0.75m.

metres) and deep (40+ metres)<sup>5</sup>, where compliance with the HIRB standard will likely prevent development over 4-storeys/ 12m in height – well below the proposed height limit of 19.5m (refer to Figure 5). For these sites especially, in order to achieve a development of the size and scale generally anticipated for the Residential 2 zone, there is a need for a more enabling HIRB standard that works in concert with permitted height limits.

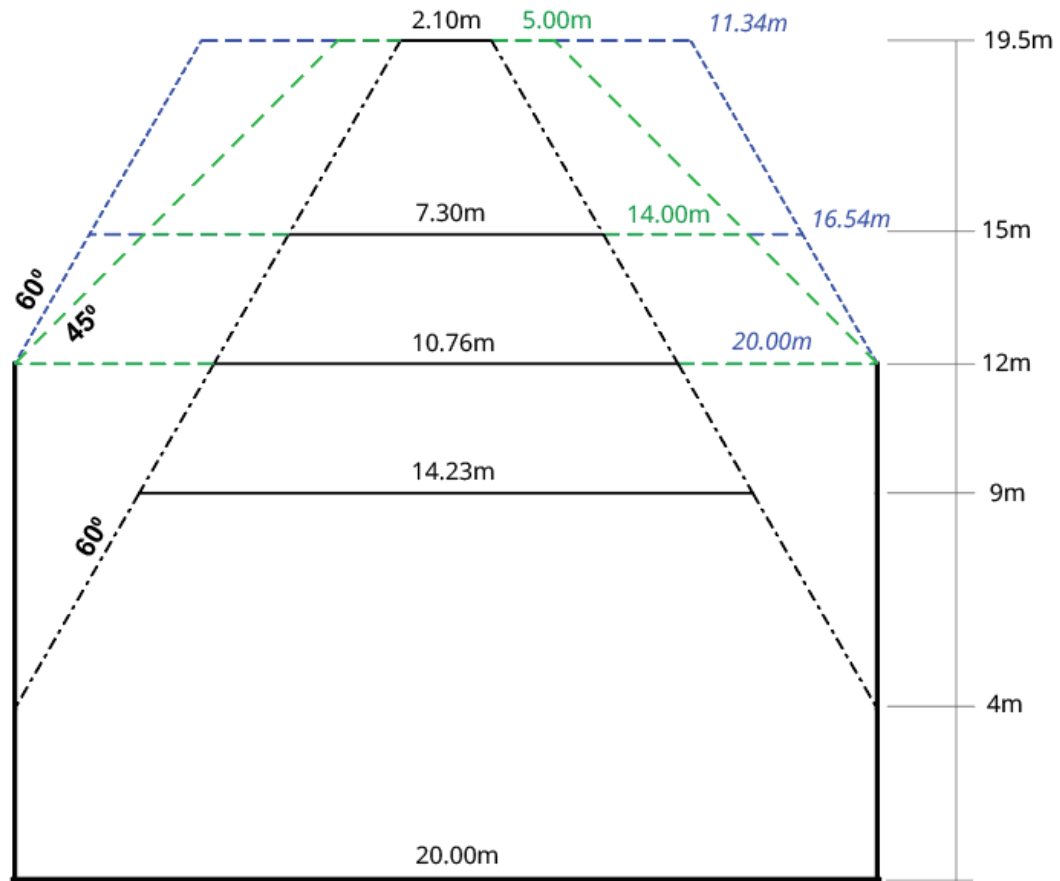


**Figure 5 - Alternative HIRB Scenarios**

Apartment buildings (and to a lesser degree terraced housing development) typically require a large, flat floor plate at each level so that multiple units at each level share a stair landing and potentially a lift lobby. Taking the minimum unit sizes (recommended above), it would not be unreasonable to assume a floor plate of at least 260m<sup>2</sup> (roughly 12m wide by 22m deep). If HIRB are set too restrictive it can limit the viability of achievable floorplates at upper levels, effectively acting as a de facto height limit.

To address the above, a number of alternative HIRB standards and permitted building heights were tested (refer to Attachment 2) for between 15 and 21m in height. In undertaking this modelling, two different building configurations were considered – firstly, a long perpendicular form with dwellings orientated over side boundaries and secondly, a form with dwellings primarily orientated over the street and rear of the site. This was assumed to occur on a typical site with a width of 20m.

In order to accommodate viable floorplates at upper levels consistent with a planned urban character of apartment living in the Residential 2 zone, a HIRB control of 12m + 60° is recommended. On a typical 20m wide site this would enable the development of a six-storey apartment building where the only the upper

<sup>5</sup> Refer to attachment 1

two-storeys require a setback from the side boundaries. At the maximum permitted height limit this would enable a floor plate of approximately 11.3m in width which is considered sufficient to produce a viable floor plate for apartment type development. This would effectively create set-backs of just over 4m from the side boundaries.

A 4m setback is sufficient in most cases to make at the majority of the upper two storeys “disappear” from view behind the leading edge of the lower form when viewed from the ground level of adjacent properties helping to reduce the perceived height of the building. A 4m setback also means that the proposed HIRB control is well aligned to the outlook standard as it could apply to the upper levels of an apartment building.

In addition to the 12m + 60°, it is also recommended that this should only apply for the first 23.5m (1.5m front yard + 22m maximum building length) of the site from the street boundary. Beyond this, the 4m + 60° of the Residential 1 zone should apply. This is intended to facilitate the greatest level of development at the site frontage, provide better light and outlook between more intensive building forms and avoid excessive overlooking and dominance at side boundaries. This will also enable effects associated with the additional building bulk or larger apartment buildings enabled in the Residential 2 zone (e.g. dominance, loss of privacy) can be directed towards/ absorbed by the street (and any neighbouring front yards or roofs of existing buildings), rather than private open spaces at the rear of existing dwellings (refer to Figure 6). This will help support Policy 3 and Policy 5 by encouraging a built-form which can better promote passive surveillance of streets and supporting a high quality built-form which minimises effects on neighbouring properties.

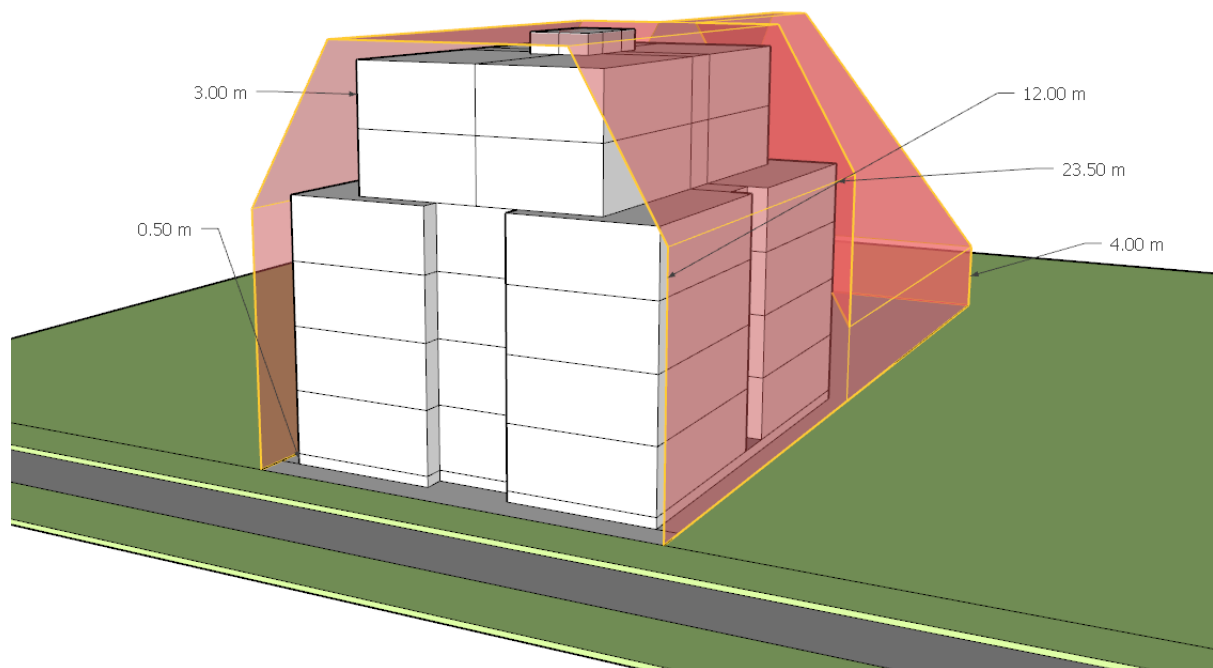


**Figure 6 - Built-form enabled by bulk and massing related development standards**

### 4.3 Minimum balcony dimension

The Residential 2 zone is located in an area which performs well in the accessibility analysis undertaken for Rotorua. A key reason is the proximity to a range of amenities including hospitality and entertainment venues, open spaces and schools. Combined, these serve to reduce the requirement for on-site outdoor

living spaces and are an important ‘trade-off’ that distinguishes low-density suburban housing from more intensive housing in and around centres.

Given the accessibility to these amenities, the Residential 2 zone would also benefit from reduced outdoor living space requirements that form part of the MDRS – primarily associated with balconies. A reduction to 1.5m and 6m<sup>2</sup> is recommended.

A 1.5m dimension still enables the placement of a small table and chairs whilst preserving circulation space around one side. This, in combination with the minimum areas would also allow for outside clothes drying with a drying rack, a small barbeque and potentially some small pot plants.

## 5.0 Commercial Zones

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### 5.1 Maximum permitted heights

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Consistent with changes to building heights/ densities within the Residential 1 and Residential 2 zones, the NPS-UD also requires consideration of building heights within commercial zones in terms of enabling greater residential and commercial densities. The CCZ1 zone, along with parts of the CCZ2 and CCZ3 zones are identified as having the highest levels of accessibility within Rotorua.

There are a range of existing permitted building heights across commercial zones from 20m in the CCZ1, CCZ3, Com5 and Com6 zones, 12m in the Com1, Com2, and Com4 zones, and no height limit in the CCZ2 zone. Building heights in the Com3 zone must be aligned with the neighbouring zone.

It is recommended that the permitted heights in the various zones be amended to reflect higher levels of accessibility (relative to other areas) and contribute to overall legibility of urban form. In urban design terms, this seeks to enable greater heights in the centre to help signify its importance in the wider environment and transition building scale down towards the periphery. This is a traditional urban design approach that also generally reflects land development economics where land prices within a city centre are typically higher and can more feasibly support more intensive development.

A building height of 32m (which can facilitate 8-10 storey development depending on use/ floor-to-floor heights) is recommended for Rotorua within the City Centre. This height is approximately equivalent to the Hinemoa Tower (9-storeys with an architectural height of 36m). Heights would then transition down to 24m in the neighbouring CC2, CC3, Com4 and Com6 zones. These heights remain within what could be considered “mid-rise” typologies and would retain the feel of a human scaled environment, albeit at the upper end of this concept. Building heights above 8-10 storeys are increasingly complex in terms of their design and can give rise to a number of other external issues which can impact on the surrounding environment such as the downdraught effect or shading of important public open spaces which may require an additional suite of design standards. An alternative would be to consider these issues as part of an overall design assessment for new buildings.

The transition in building heights continues outside of the City Centre via the CC2 and CC3 zones (24m) down to the 19.5m proposed for the Residential 2 zone and 11m for the Residential 1 zone. Heights of 20m are recommended for the Com1 and Com2 zones. These zones relate to some of the larger secondary centres within Rotorua (e.g. Owata, Ngongotaha and Westend) and would help signify these centres (assisting with wayfinding and legibility) within the wider urban environment should these development opportunities be realised. It is recommended that the existing height standards for the Com3 zone is retained.

In addition to generally enabling increased building heights, it is important to consider the impact larger buildings can have on public realm and wider impressions of an urban area. In this regard, there would be benefit in including additional matters of discretion and/ or assessment criteria relating to the design of new buildings – particularly the interface with the public realm.

## 5.2 Height in Relation to Boundary

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In addition to increased building heights, it is worthwhile considering complementary changes to HIRB standards, where the commercial zones adjoin a lower density residential zone. There is a risk that this may result in off-site amenity impacts on directly adjacent residential properties noting that development could include taller office buildings which do not require set-backs or outlook more commonly required for residential uses. In this instance, all commercial zones should meet the adjacent HIRB standards that apply to the Residential 1 or Residential 2 zone (whichever is applicable). This will aid in minimising adverse shading, privacy and dominance issues for neighbouring residential sites.

## 5.3 Yards

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Consistent with the approach to HIRB outlined above in 5.2, an amendment to the yard controls to 3m adjacent to the Residential 1 and 2 zones is also recommended. This would enable either a 1.8m high close boarded fence or a 2m deep landscaping strip that could enable vegetation up to 1.8m in height. In other words, there were no applicable yard standards in the Com1, Com2, Com3 and Com 6 zones. The existing 2.5m yard for the Com4 should also be increased to 3m to align with these zones.

The benefit of this control is that it would provide some physical separation of the higher commercial buildings proposed with an adjacent residential property whilst still supporting a functional dimension that could support alternative uses such as an accessway to on-site car-parking or alternatively increased landscaping depending on the specific needs of the building.

## 5.4 Residential Standards

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### 5.4.1 Minimum dwelling size

The existing minimum dwelling size controls within commercial zones (50m<sup>2</sup> for a studio/ 1-bed and 70m<sup>2</sup> for 2-beds or more) are, in my opinion, unnecessarily large and have been set at a level which can actively discourage the development of multi-unit residential schemes within commercial zones including the City Centre and are inconsistent with the overall policy intent of the NPS-UD.

Further, the application of the same area standard for both studio and 1-bedroom dwellings fails to recognise that these are fundamentally different unit typologies. Studio apartments are, by definition, defined by the use of a single multifunctional room where living/ sleeping and cooking spaces are consolidated (with a separate bathroom/ toilet).

In line with my comments in Section 3.2, I consider that there would be value in aligning minimum dwelling sizes to those with the residential zones. The reduction in minimum dwelling sizes will also have a benefit in reducing the overall cost to deliver.

### 5.4.2 Outdoor Living Space

As with the issues around minimum dwelling sizes, existing outdoor living space standards (10m<sup>2</sup>/ 2m deep) for residential dwellings within city centre and commercial zones are considered unnecessarily large and a potential deterrent to greater uptake of intensification opportunities.

It is recommended that the minimum standards are aligned with the Residential 2 zone (6m<sup>2</sup>/ 1.5m minimum dimension). In addition, there is a benefit for enabling dwellings to provide no external outdoor living space in exchange for increased internal space. This provides an applicant with the ability to deliver residential dwellings that can respond to the slightly different context of locating in a commercial environment (as opposed to a residential one). This includes the potential for increased noise (e.g. from being located in close proximity to food and beverage tenancies, or from servicing of commercial tenancies).

### 5.4.3 Outlook Space

Increased residential uses within commercial zones, coupled with increased building heights and limited setbacks creates a risk of adverse amenity outcomes in residential dwellings in these areas. This risk is primarily in the form of adjacent sites being built out to their maximum extent, reducing or removing access to sunlight, daylight or outlook of existing dwellings over side boundaries if this has previously been relied upon.

To address this, dwellings should generally be encouraged to orientate themselves over the street but where this is not possible the inclusion of an outlook space control would be beneficial as this provides some degree of guaranteed separation for residential units at upper levels in the event adjacent buildings are constructed. For simplicity, this should be aligned with the outlook standards of the Residential 2 zone noting that the majority of the building heights proposed within these zones are comparable to that of the Residential 2 zone. In addition to the above, this standard could be supported by specific matters of discretion/ assessment criteria related to on-site amenity issues to aid in the assessment of any application.

### 5.4.4 Storage

The District Plan currently requires a minimum storage area for all residential dwellings within commercial zones of 6m<sup>3</sup>, with a minimum dimension of 1.5m and height of 2.4m high. This is presumably independent of other typical storage areas found within a dwelling (e.g. kitchen cupboards). These standards apply regardless of dwelling size or intended occupancy.

Whilst storage can be an important amenity for some, for others it has less utility and may only result in increased housing costs for little benefit. Such a requirement also ignores alternative storage options available as part of furniture (e.g. in-built draws under beds) or via dedicated storage facilities. As such, I consider that it would be more appropriate for a specific standard around storage to be removed. Instead, this would be better addressed as part on overall design assessment of a development. This could be done through matters of discretion or assessment criteria relating to things such as cycle parking.

## 6.0 Subdivision

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### 6.1 Minimum Vacant Lot

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The Operative District Plan currently provides for a minimum vacant lot subdivision of 450m<sup>2</sup>. This is considered unnecessarily large and not well aligned with seeking to promote greater levels of intensification. In many historical urban areas in New Zealand, detached housing has been delivered on sites of 300m<sup>2</sup> and lower. Similarly, contemporary medium density developments which have been comprehensively

masterplanned have delivered quality detached housing on as little as 150m<sup>2</sup>, whilst terraced housing typologies are delivered on sites as small as 100m<sup>2</sup>. Smaller lot sizes would typically be achieved through a land use consent process where the design of a development can be assessed as part of the subdivision application.

In line with seeking a more enabling approach to housing, the minimum vacant lot subdivision standards could be reduced to 250m<sup>2</sup> with the requirement to accommodate an 8x15m building platform outside of yard requirements and other site constraints (e.g. flood affected areas or geothermal bore holes). A 250m<sup>2</sup> site area combined with an 8x15m building platform provides a degree of flexibility for future dwelling design. Design testing indicates that a typical stand-alone dwelling could be delivered on a smaller section than this. However, this relies on a perfectly flat site. As the standard needs to apply to residential areas more broadly it will capture sites which feature topographical constraints or geometric constraints from an irregularly shaped parent lot. Adopting a smaller site area and more constrained building platform therefore creates a risk that only a very specific building design can be accommodated which would not be consistent with seeking to enable a variety of building typologies. In my opinion, there needs to be sufficient flexibility in the minimum vacant lot standards to enable the development of a new dwelling with undue risk of infringing development standards and creating a notification risk which can act as a barrier to development and good urban design outcomes.

Attachment 1 – HDRZ Parcel Analysis

Average Site Areas



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## Typical Site Widths



**Barker & Associates**

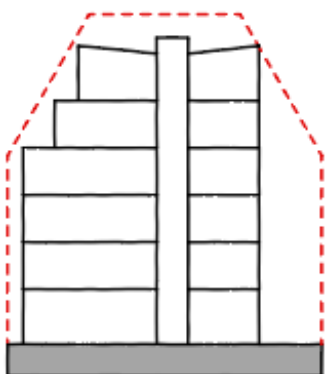
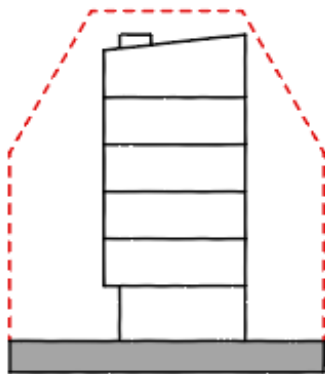
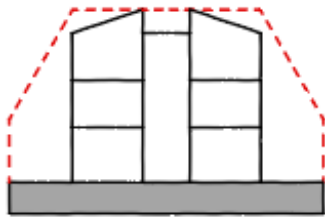
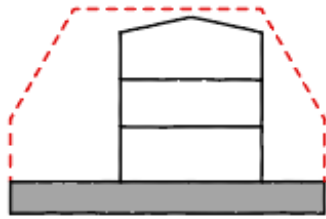
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Attachment 2 – HiRB Testing Schematics

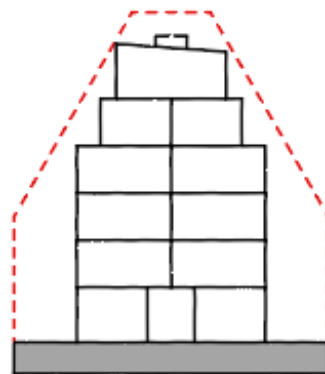
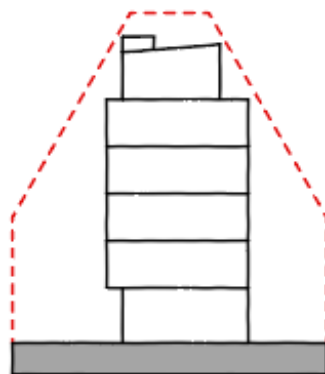
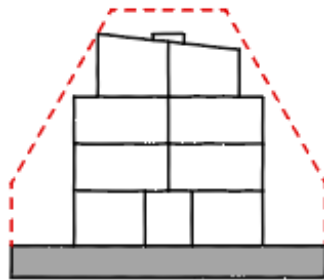
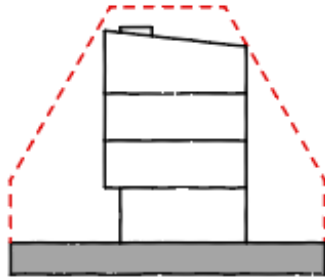
HIRB Controls Considered for Res 1 and Res2 zones

**11m (4m + 60°)**



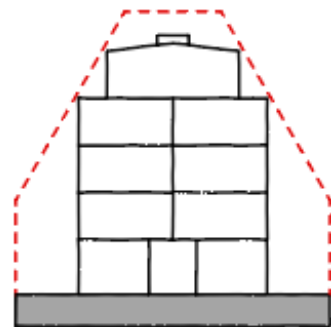
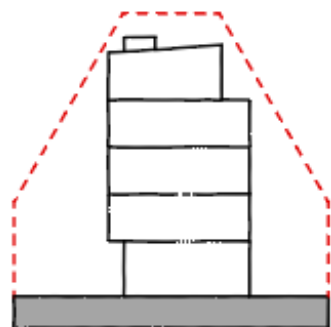
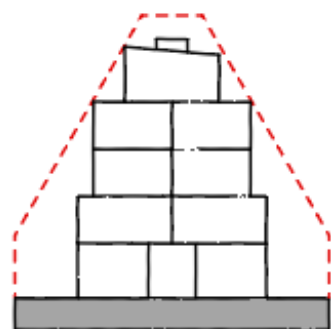
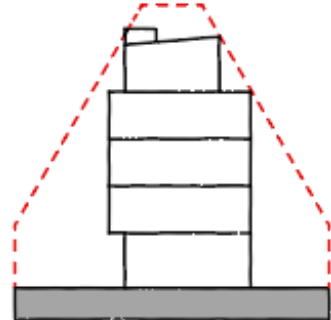
**21m (12m + 60°)**

**15m (4m + 60°)**



**21m (8m + 60°)**

**18m (4m + 60°)**



**18m (6m + 60°)**