

BEFORE THE INDEPENDENT HEARING PANEL  
APPOINTED BY PALMERSTON NORTH CITY COUNCIL

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

AND

**IN THE MATTER** of Plan Change E:  
Roxburgh Residential Area -  
Rezoning from Industrial to  
Residential Zone

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**STATEMENT OF EVIDENCE OF KATHERINE JOHNSON  
BLAGROVE and JAIME MARY JOAN DEVEREUX  
ON BEHALF OF FRANCES HOLDINGS LTD  
5 APRIL 2025**

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## **1. INTRODUCTION**

- 1.1. This evidence has been co-authored by Kate Blagrove and Jaime Devereux, with a joint position on the matters discussed below, unless otherwise stated.

### **Kate Blagrove Qualifications and Experience**

- 1.2. My full name is Katherine Johnson Blagrove, and I have recently joined Urban Edge Planning Limited as an Urban Designer. Prior to this, I was a Principal Urban Designer at Auckland City Council.
- 1.3. I hold the qualifications of a Bachelor of Development Studies and Sociology from Victoria University of Wellington (2010) and Masters of Urban Planning and Urban Design from the University of Auckland (2019).
- 1.4. I have worked for Auckland Council for the past six and a half years as an urban designer and the past one and a half years as a principal urban designer.
- 1.5. My experience includes:
- Urban Design evidence on behalf of Auckland Council for Plan Change 78 in the city centre;
  - Urban Design evidence for numerous resource consent hearings;
  - Completing urban design reports on behalf of Auckland council primarily for residential subdivisions containing up to 500 lots including in Ormiston, Papakura and Mt Wellington.
- 1.6. I am an intermediate member of the New Zealand Planning Institute and Urban Design Forum.

### **Jaime Devereux Qualifications and Experience**

- 1.7. My full name is Jaime Mary Joan Devereux and I am a Director of Urban Edge Planning.
- 1.8. I have a bachelor's degree in Architecture from Victoria University of Wellington, a Master of Resource and Environmental Planning from Massey University, and a Certificate in Landscape Design from Southern Institute of Technology. I have six years of experience as an architectural designer, approximately five years as a planner, and seven years of experience as an urban designer, including an urban design advisor for Councils (including Upper Hutt City Council, Hutt City Council, Kapiti Coast District Council, and Wellington City Council).

1.9. I have been involved in a large number of projects requiring urban design expertise, particularly within the residential context and provided expert evidence at hearings.

1.10. I completed the Making Good Decisions in 2004 and have sat as a Commissioner in a panel.

#### **Involvement with Submission in relation to Plan Change E: Roxburgh Residential Area**

1.11. I have been engaged by Frances Holdings Ltd to provide urban design expert evidence to supplement the submission prepared by Paul Thomas.

1.12. I confirm that I have read the submissions and have referenced key issues raised in the submissions within this report.

#### **Code of Conduct**

1.13. Although this is a Council hearing, I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving evidence. My qualifications as an expert are set out above. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise.

#### **Scope of Evidence**

1.14. (a) Response on the urban design recommendations within the Urban Design report prepared by McIndoeURBAN, dated 11 January 2024

(b) Urban Design considerations raised in submissions

(c) Conclusion and recommendations

## **2. URBAN DESIGN REPORT RESPONSE**

2.1. I agree with the Council's urban design advisors that the Roxburgh area has the potential to become a well-connected, liveable, and diverse residential neighbourhood. My evidence does not challenge these core objectives. Instead, it proposes a more flexible and proportionate implementation approach that better reflects the constraints of the site, including its fragmented ownership, land acquisition uncertainties, and inner-urban brownfield context.

- 2.2. The Urban Design Report prepared by McIndoeURBAN presents a thorough and well-reasoned assessment of the site and urban context and the structure plan outlined in the report provides a framework for achieving positive urban design outcomes. However, given the modest scale of the site (approximately 4.5ha), aspects of the structure plan are, in my view, disproportionately prescriptive. A structure plan combined with a flexible, outcome-focused framework would support adaptive development over time, while still safeguarding the key qualities sought for this neighbourhood.
- 2.3. Under the current provisions of Plan Change E, any deviation from the structure plan would result in a discretionary activity status. This potentially introduces risk and limits the responsiveness of the design. If deviations are proposed to respond to site-specific constraints or market conditions, the resulting discretionary (full) activity status could create unnecessary consenting risk and limit otherwise appropriate development outcomes. A more flexible framework could enable high-quality, adaptive responses over time.
- 2.4. I have focused my assessment on seven key urban design outcomes in the McIndoeURBAN report:

Design Outcomes	Level of support	Summary
Connections to the river	Support in full	Road D provides a logical connection from Ruahine Street and Roxburgh Crescent to the Manawatū River.
Pedestrian/cycle connections	Support in full	The link at the southern end of Road A is a positive connection for southern properties to the wider network and local amenities, such as the Winchester Store.
Open space/reserve	Support in part	I support a central reserve location, but consider it could be located on either side of Road B with appropriate design.
Building heights/engagement with the river	Support in full	Taller buildings adjacent to the stop bank are appropriate and will enhance activation and visual engagement with the river.
Lot sizes	Support in part	I support intensification and multi-unit housing. I agree with allowing a range of lot sizes to support

		housing diversity, and recommend enabling sites up to 600m <sup>2</sup> , noting that intensification will still be provided at this level.
Layout/arrangement of lots	Support in part	The southern block benefits from east-west orientation. The northern block could accommodate diverse outcomes with sunlight standards.
Cul-de-sacs/rear lots	Support in part	I agree cul-de-sacs should be avoided where possible. However, greater flexibility is possible in the irregular northern block.

These matters are elaborated further below.

### **Connections to the River**

- 2.5. I support maintaining a continuous east-west connection from Ruahine Street to the Manawatū River corridor. This connection (Road D and C) is critical for long-term public accessibility and legibility.
- 2.6. Frances Holdings Ltd (FHL) seeks flexibility to allow parallel parking adjacent the reserve instead of right-angle parking. From an urban design standpoint, either configuration can achieve the desired public realm outcome.
- 2.7. If future rights-of-way or laneways are developed from Roxburgh Crescent, I would recommend continuing this access through to the riverbank. This should only be required if there are logical and practicable access points (for example, based on the topography and location of public pedestrian routes to connect into).

### **Pedestrian/cycle connections**

- 2.8. Pedestrian and cycling access to the river is an important benefit of the Roxburgh Structure Plan area. Ideally, a dedicated cycle path along the central road from Ruahine Street to the river would strengthen this connection. However, the width constraints at the Ruahine–Roxburgh junction (due to private land outside the plan change area) limit this opportunity. Nevertheless, the linear form of Roxburgh Crescent and Road D, combined with reserve frontage and clear sightlines, will support safe and legible movement.

- 2.9. A secondary pedestrian or multi-modal connection from Ruahine Street into Road A would improve accessibility for local residents. The form of this connection (pedestrian only or shared) should be determined based on future development layout, with an emphasis on permeability.

#### **Open Space/Reserve**

- 2.10. I support the concept of a centrally located reserve. However, the requirement to locate it only on the southern side of Road D is unnecessarily prescriptive. With appropriate design, high-quality outcomes are achievable on either side. A flexible approach would better enable integration with future subdivision layouts.

#### **Building Heights/Engagement with the river**

- 2.11. I support allowing three-storey buildings adjacent to the river corridor. The existing stop bank limits visual connectivity, and increased height will encourage river-facing development with active upper-level living spaces. The stop bank form already screens much of the river corridor from other parts of the site, so taller buildings will have limited wider effects on views or amenity.

#### **Lot sizes**

- 2.12. I agree with McIndoeUrban that a diversity of housing typologies and some variability in lot sizes are important. However, locking in maximum lot sizes of 500m<sup>2</sup> may inadvertently preclude more adaptable typologies such as duplexes or multi-generational housing. Slightly increasing this to 600m<sup>2</sup>, particularly outside the river edge, enables greater typological flexibility without compromising overall yield or connectivity.
- 2.13. The Plan Change proposes a maximum of one dwelling unit on 250m<sup>2</sup> and two units on 500m<sup>2</sup>. I note that the wording of this standard has been amended in response to the Frances Holdings Ltd submission and agree with that change. I also agree with the intent of the standard as it allows for a wider range of housing typologies. I have no strong view on whether 500m<sup>2</sup> or 600m<sup>2</sup> maximum lot sizes results in a better urban design outcome. 500m<sup>2</sup> sites supports greater intensification, however 600m<sup>2</sup> sites provide greater diversity and typology opportunities.
- 2.14. I agree with Mr McDonald that smaller lot sizes near the riverfront provide the greatest opportunity for higher-intensity development. However, outside of this

zone, greater flexibility is appropriate. This would also support the intent of the National Policy Statement on Urban Development by enabling a variety of lot sizes and housing typologies that can adapt to changing household needs and market conditions.

- 2.15. I recommend keeping the riverfront lots as proposed, with maximum building heights of 11m, and lot sizes of 250m<sup>2</sup> to 500m<sup>2</sup>, but allowing 600m<sup>2</sup> lots elsewhere in the plan change area. 600m<sup>2</sup> is not considered to be a large lot size, with the majority of sites in the nearby area being between 650-850m<sup>2</sup>. This could also reduce potential reverse sensitivity effects on neighbouring properties. A wider setback, as suggested by Mr McDonald, would then have less impact on the potential house footprint and enable optimal orientation of outdoor living spaces (due to outdoor living areas being more favourable on the north, west or eastern side of the residential unit for sunlight access, rather than the south).

#### **Layout/orientation of lots**

- 2.16. East-west orientation in the southern block is positive for solar access. While the structure plan suggests this pattern should apply throughout, flexibility should be retained in the northern block, where site constraints (with a less regular shaped area) may warrant different orientations. Appropriate sunlight access can be safeguarded through built form standards rather than rigid lot layout prescriptions.

#### **Cul de sacs/rear lots**

- 2.17. The McIndoeURBAN report identifies a pattern of cul-de-sacs and rear lots in the existing environment as a result of past residential infill development. I agree that cul-de-sacs restrict connectivity and pedestrian permeability and are not a recommended street network layout, particularly on an unconstrained site. This approach is consistent with guidance in the non-statutory, Palmerston North Street Design Manual for Palmerston North residential streets, on page 64, which states: Cul-de-sac use should be minimised and connectivity should be encouraged between streets, local services and surrounding features.
- 2.18. While the inclusion of new public Roads A and B within the Structure Plan will help to achieve strong urban design outcomes by avoiding the formation of cul-de-sacs, the highly prescriptive approach may unnecessarily constrain flexibility for alternative development layouts on what is a relatively small and awkwardly shaped area of land.

For example, enabling the use of private roads in the northern part of the site could allow several developers to collaborate in delivering small-scale comprehensive developments while still ensuring good pedestrian permeability and site connectivity through carefully designed shared accessways. This approach could support more intensive and diverse residential outcomes, better aligning with the objectives for housing choice and efficient land use. A more flexible framework; one that sets out the essential urban design outcomes (such as minimum levels of pedestrian connectivity, public access to the river corridor, and a clear street hierarchy), but allows different design responses, would better enable site-specific solutions and support a resilient, adaptable pattern of development over time, without the rigidity imposed by the proposed Structure Plan, particularly in the northern part of the site.

- 2.19. Allowing flexibility enables staged delivery of the structure plan area without undermining the long-term vision for connectivity and open space.
- 2.20. It is also noted that the traffic report provided by WSP does not require all internal roads to be public, as long as safe access is provided and emergency service standards are met.

### **3. CONCLUSION AND RECOMMENDATIONS**

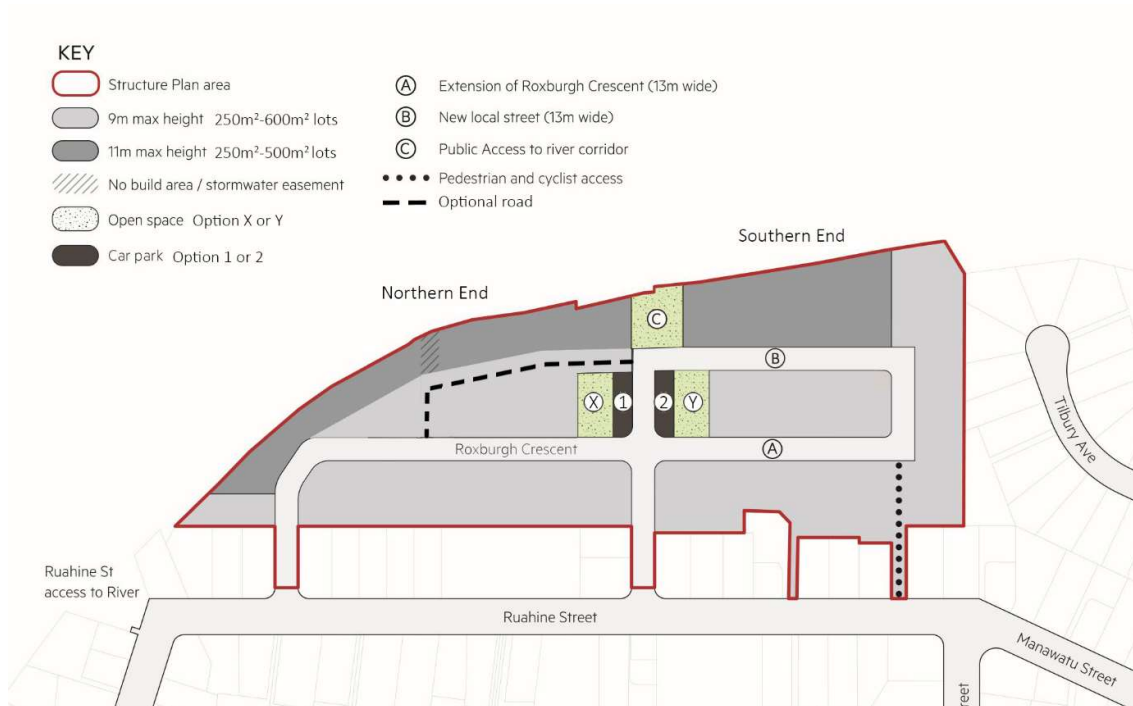
- 3.1. I support the overarching urban design outcomes promoted by the McIndoeURBAN report: a connected, compact, diverse, and well-integrated neighbourhood. However, the scale and constraints of the site warrant a more flexible planning approach.
- 3.2. While the notified provisions allow for activities not in 'general accordance' to be considered discretionary, in practice this creates a strong disincentive to innovate or depart from prescribed layouts. A more outcome-focused framework would reduce consenting risk while still securing the urban outcomes sought.
- 3.3. I recommend refining the Structure Plan and associated rules to:
  - Enable flexibility in lot sizes and housing typologies
  - Allow the location of the reserve on either side of Road D
  - Maintain key river and pedestrian connections



- Provide for private accessways where appropriate

3.4. These changes would ensure urban design quality is maintained while supporting feasibility, innovation, and responsiveness in development.

3.5. An example of how this could look is included below:



Prepared by:

Jaime Devereux

*Jaime Devereux*

Kate Blagrove

*K2B*