

BEFORE THE HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of proposed Plan Change G: Aokautere Urban
Growth to the Palmerston North City Council
District Plan

**STATEMENT OF REPLY EVIDENCE OF ANDREW BURNS ON BEHALF OF PALMERSTON NORTH
CITY COUNCIL**

URBAN DESIGN

Dated: 28 November 2023

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REPLY EVIDENCE OF ANDREW BURNS

A. INTRODUCTION

- [1] My full name is Andrew Davies Burns.
- [2] I prepared a s 42A report dated 15 September 2023 on Urban Design (**s 42A Report**) on behalf of the Palmerston North City Council (**Council**) for proposed Plan Change G: Aokautere Urban Growth to the Palmerston North District Plan (**PCG**).
- [3] My experience and qualifications are set out in my s 42A Report.
- [4] I repeat the confirmation given in my s 42A Report that I have read and will comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023, and that my evidence has been prepared in compliance with that Code.
- [5] I attended a pre-hearing meeting on 25th September 2023 that covered a wide range of matters but generally focused on the topic of masterplanning and urban design.

B. SCOPE

- [6] My reply evidence responds to points made in evidence by:
 - (a) Submitter #43 Chris Teo-Sherrell regarding proposed open space provision; garage setback standards; public transport routes; public realm amenity provision in medium density areas; and roading through the proposed Local Centre;
 - (b) Submitter #45 Christle Pilkington on behalf of Palmerston North Industrial and Residential Developments Ltd (PNIRD) (now Brian Green Residential Developments Ltd) regarding road layout flexibility at the 'Stage 9' extension to Valley Views and minor adjustments to the southeastern spur of Mr Green's land;
 - (c) Submitter #51 Amanda Coats on behalf of Heritage Estates (2000) Ltd regarding perceived deficiencies in the s 42A documentation; relationship between the Structure Plan and masterplan; distance of Aokautere from The Square;

accessibility of promontories D1 and D3; and prescriptiveness of residential outcomes;

- (d) Submitter #51 John Farquhar on behalf of Heritage Estates (2000) Ltd regarding prescriptiveness of masterplanning and its statutory/non-statutory role; density and design criteria out of touch with market; accommodating on-site parking and public transport provision; and PCG produces only 20% more lots than ODP;
- (e) Submitter #58 Paul Thomas on behalf of CTS Investments Ltd, Woodgate Ltd and Terra Civil Ltd regarding various opinions expressed in his evidence; and
- (f) Submitter #61 Pepa Moefili on behalf of Ngawai Farms Ltd (Stu Waters) regarding access to Mr Waters' rural residentially zoned land to the north-east; and adjustment to a small area of Mr Waters' land from residential to rural residential including an associated realignment to roading to recognise the ownership of Mr Green.

[7] The fact that this reply statement does not respond to every matter raised in the evidence of witnesses in the areas of masterplanning and urban design should not be taken as acceptance of the matters raised. Rather, I rely on my s 42A Report and the evidence of Ms Harriet Fraser and Mr Michael Cullen to address these matters.

C. RESPONSE TO SUBMITTER #43 CHRIS TEO-SHERRELL

Open space provision

- [8] Dr Teo-Sherrell seeks more smaller green flat playable spaces rather than fewer larger spaces on the basis this provides better active mode access.¹
- [9] The provision of open space reserves including flat playable areas, gullies and wetland features is set out on Structure Plan Map 7A.4. Open spaces are also described on page 65 of the Masterplan Report in terms of 400m walkable catchments. This level of provision has been agreed with Mr Aaron Phillips (PNCC Parks and Reserves Officer). The catchment assessment indicates that almost all the proposed residentially zoned

¹ Statement of Chris Teo-Sherrell dated 4 November 2023 at [4]-[5].

land is within 400m of a flat payable space. Exceptions occur for some promontories / plateau ends (D3, D4 and the south-eastern residential spur on Mr Green's land). In these cases, the adjacent gully reserves provide a different type of recreational amenity (off-road trails).

[10] I understand that Mr Philips' reply evidence includes a recommendation to relocate the park shown as Reserve 2. I accept that rationale and support the relocation of the play space from promontory D1 to D3 subject to finalising the optimal location on the structure plan.

[11] Subject to the above, I continue to support the proposals for open space as set out in s 42A Structure Plans and my s 42A Report and do not recommend further smaller spaces are provided.

Garage setback

[12] Dr Teo-Sherrell requests a greater garage setback distance of 6.5m rather than the proposed 5.5m.²

[13] This matter is addressed in my s 42A Report,³ and reiterate that 5.5m maintains the intention of reducing the prominence of driveways at the site frontage, provides for an 85th percentile car (4.91m length), is consistent with garage setback controls elsewhere (e.g. Auckland), is only marginally less than the 6m that currently applies and avoids the potential for vehicles to overhang footpaths.

Public transport (bus routes)

[14] Dr Teo-Sherrell raises concerns about the bus routes impacting the village square in the proposed Local Centre. My opinion is that a centrally located bus route would optimise the performance of the centre. This is based on my professional experience and on various sources of literature that highlight that the performance of commercial centres is optimised when public transport channels directly into the core areas such as these.

² At [8]-[11].

³ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [159].

I consider that bus stops could be strategically situated along the Activity Street to the immediate north or south of the village square to facilitate access and promote footfall.

- [15] Ultimately, however, I recognise that the operational routes of busses will be a matter for Horizons Regional Council to determine as noted in the reply evidence of Ms Fraser.⁴

Medium density areas

- [16] Dr Teo-Sherrell supports the provision of medium density housing including proximity of a Local Centre but considers the need for differentiation between medium and lower density housing areas though enhanced public realm amenity.⁵
- [17] I agree with these observations and consider they have been (mostly) provided for in the proposed Structure Plan and associated planning provisions.
- [18] The notified street cross sections that occur in both medium density and lower density areas all describe high amenity streetscapes with structured tree planting, rain gardens, footpaths both sides and/or shared paths enhancing active mode environments. Where medium density is proposed at North Village, this area includes walkable access to the Local Centre and provision of open space in the form of a suburban reserve and adjoining wetland area that links to Gully 1. These are features that do not occur in lower density areas and are a specific design response supporting medium density housing. At the promontories where medium density is enabled (but not required), the higher level of amenity is provided by the 'shared surface' street design approach and the proximity to gullies/outlook/recreational amenity on almost all sides.

Activity Streets through the Local Centre

- [19] Dr Teo-Sherrell seeks changes to the roading system through the Local Centre, particularly affecting the one-way component of 'Activity Street C'. The submitter requests the removal of the one-way street and associated car parking outside the Anchor Store and inclusion of "vehicle excluded" areas.⁶ Other requests relate to

⁴ Statement of Reply Evidence of Harriet Fraser dated 28 November 2023 at [18].

⁵ Statement of Chris Teo-Sherrell dated 4 November 2023 at [16], [20], and [22].

⁶ Statement of Chris Teo-Sherrell dated 4 November 2023 at [115]-[117].

vehicle speeds through the centre and cross section dimensional adjustments, these matters are addressed in the evidence of Ms Fraser.⁷

- [20] I comment on the request to remove the one-way street and parking outside the anchor store. This would remove full access to the store's primary frontage facing the square and re-orient a primary frontage south onto a residential street. This is likely to result in the store's square frontage becoming a secondary frontage with reduced fenestration and activation. A preferable outcome (that would help achieve the submitter's request) would be the creation of a shared surface⁸ street space (see Figure 1 below) for the one-way road adjacent to the store. The store's primary frontage facing the square would thereby be retained, with increased pedestrian amenity and a stronger 'square presence' achieved, while permitting multi-modal access for the Anchor Store.



Figure 1: Clapham Old Town, Lambeth, UK (project by Urban Movement, 2007-15)

D. RESPONSE TO SUBMITTER #45 EVIDENCE OF CHRISTLE PILKINGTON

Roading alignments and flexibility

- [21] Ms Pilkington seeks flexibility to introduce an alternative road layout shown in Stage 9 of the Valley Views development (see Figure 2 below). I understand this application has yet to be lodged with Council. The submitter also requests an adjustment to the roading

⁷ Statement of Reply Evidence of Harriet Fraser dated 28 November 2023 at [18].

⁸ Manual for Streets 2, 2010 pgs 27, 28.

labelled 'Alternative Road Alignment' to address access to Mr Green's land without requiring an intersection on Mr Waters' land.



Figure 2: Extract of plan from Submitter's evidence

- [22] I refer to my s 42A Report that identifies changes to the roading network introducing 'fixed' and 'flexible' road types and locations.⁹
- [23] I acknowledge the concern raised about the urban connectors, particularly the Type E/F connectors shown on Map 7A.4A. The evidence suggests a request for re-classification of a short section of this connector as peri-urban, allowing for greater flexibility in this location. I consider that would be appropriate here and I believe this to be supported by Ms Fraser.¹⁰
- [24] The other roading alternative sought is a so-called 'Terrace Link Road' between South Village and the proposed extension of Valley Views Road (see Figure 2 above). In the Structure Plan, this link would replace a Peri-Urban Road which already has a flexible location. So, the exact alignment of the link is less at issue than the nature of its connections with Valley Views Road, South Village and (indirectly) Pacific Drive.
- [25] The Terrace Link Road indicates adjustments are necessary to connections into the South Village 'Local Road' system. Local Roads are defined as 'flexible' and therefore can facilitate changes to alignment and intersections as necessary. I observe that the

⁹ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [49], [115]. See also Structure Plan Map 7A.4D.

¹⁰ Statement of Reply Evidence of Harriet Fraser dated 28 November 2023 at [13].

Terrace Link Road as proposed by the submitter could be better resolved to connect into the linear open space (see Figure 13 of my s 42A Report) that defines the northern edge of South Village – an approach I would support.

E. RESPONSE TO SUBMITTER #51 EVIDENCE OF AMANDA COATS

Section 42A documentation

- [26] Ms Coats states there are deficiencies in the notified documents and section 42A reports that prevent an understanding / assessment of actual effects.¹¹
- [27] With regard to further assessment and plan adjustments, I refer to my s 42A Report.¹² This details additional work that was undertaken in response to submissions. The report also identifies changes that I recommend be made to PCG as a result.
- [28] With respect to 3-dimensional / contour information, I note that geotechnical and civil engineering input was provided by Tonkin + Taylor during the early stages of the masterplanning process. That information informed the location of developable areas along the plateaus between gullies and tested the ability to introduce roads to service those areas. Once the broad parameters of development areas and access had been established these were transferred into our AutoCAD drawing files as 2-dimensional data and used to test residential street and block layouts. Those layouts eventually informed the Structure Plan areas for development, open space and access.
- [29] While further existing road named could be inserted to the Structure Plan for ease of reading, the level of information on the structure plans was tested at various stages with a view to avoiding overly cluttered graphic outcomes.
- [30] On Map 7A.4 unbuilt / proposed vs existing or consented roads are indicated by association with dark grey proposed development and existing roading with white existing development (Figure 3 below). As above, this was to reduce the amount of information on the graphic. I recognise this is not the case for Maps 7A.4A, 7A.4D and

¹¹ Statement of Evidence of Amanda Coats dated 3 November 2023 at [10](a)-(i).

¹² Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [40]-[73].

I agree with Ms Coats' suggestion for further differentiation between existing and proposed roads where the latter could be shown with dashed outlines.



Figure 3: Map 7A.4 Unbuilt / proposed vs existing / consented roads

- [31] I acknowledge that bridges are not represented in the Structure Plans. This is not a lack of clarity however, as it is an intentional omission that recognises there are multiple ways that crossings can be provided, and these alternatives may not involve traditional bridges.
- [32] I am certainly open to provide further clarity where that is appropriate on the structure plan, but I would observe that there is a balance to be achieved between clarity and clutter.

Masterplan vs Structure Plans

- [33] Ms Coats expresses concern that the Masterplan and Structure Plans are “*one and the same*”.¹³ In my s 42A Report I describe the Masterplanning process necessary to test what is possible and feasible for the PCG area and then state that the Structure Plan is derived from the masterplan options process.¹⁴ In my experience of preparing numerous Structure Plans for Local Authorities and the private sector this is a typical and robust approach. It is clear that the masterplan underpins the Structure Plans but presents a different level of information, with the latter simplifying or subtracting from the masterplan so as to be suitable as a planning instrument.

¹³ Statement of Evidence of Amanda Coats dated 3 November 2023 at [13].

¹⁴ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at p 14.

Distance from The Square

- [34] Ms Coats expresses concern about the distance of Aokautere from Palmerston North's city centre / The Square.¹⁵ I am unclear as to the significance of these observations.
- [35] My s 42A Report provides a city-wide contextual diagram indicating approximate distances 'as the crow flies' of various growth areas to The Square.¹⁶ This is simply meant to provide a geographical reference to locate Aokautere within its city-wide context. I indicate that the central point of Aokautere lies on a 6km radius if drawn from The Square. I have double-checked the distance between The Square and the proposed Aokautere Local Centre using Council's online GIS tool, measuring the distance if following roads, and confirm a distance of 6km. I have compared this to the distance from The Square to the commercial and medium density part of PCWL's Plan Change B (5km-5.4km) at Kākātangiata (refer to **Attachment A**). Therefore, the Aokautere Local Centre and adjacent medium density housing is approximately 1km further from The Square than the example referred to by the submitter.

Distance to promontories

- [36] Ms Coats' evidence appears concerned about the provision of cross gully links and the accessibility of the plateaus. The submitter also appears concerned about the landowner's/developer's cost of developing this roading infrastructure. I am unclear as to the significance of these observations to this submitter, as the submitter is not the landowner or developer here.
- [37] I understand that the landowner of Gully 1 has already pursued a resource consent through Horizons Regional Council to build a cross gully connection. This initiative reflects an understanding of the value in achieving enhanced connectivity and suggests the viability of such an endeavour (however, I note that the City Council has not given its consent to this proposal). The Structure Plan also indicates the benefit of providing a cross gully link in the form of an Urban Connector and recognising the need for further civil engineering has identified this as a 'flexible' road type. The plan also adequately

¹⁵ Statement of Evidence of Amanda Coats dated 3 November 2023 at [27].

¹⁶ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at p 9, Figure 1.

addresses the needs of active modes, with pedestrian and cycle paths include a network of on and off-road routes.

- [38] I address the matter of 'Distance from amenities' in my s 42A Report.¹⁷ Most medium density housing in PCG is located within 400m of the Local Centre. Any higher density on promontories is enabled (not required) and is justified by exceptional open space amenity rather than proximity to services. The recent Mātangi Plan Change (Whiskey Creek) provides a precedent for this approach.

Prescriptiveness of residential typologies

- [39] Ms Coats' evidence raises a concern around the likely uptake of medium density housing at Aokautere and considers the plan too prescriptive in this regard.¹⁸
- [40] I address this matter below in response to Submitter #58 and also in my s 42A Report.¹⁹ I note that in the Aokautere Medium Density Village area minimum densities would apply to whole subdivisions or superlots i.e., flexibility remains at the scale of individual lots. The Structure Plan and provisions also remain flexible regarding dwelling type, ensuring the Structure Plan offers a reasonable level of flexibility.

F. RESPONSE TO SUBMITTER #51 EVIDENCE OF JOHN FARQUHAR

Prescriptiveness of the Plan, density and demand

- [41] Mr Farquhar's concerns about the level of prescriptiveness of the plan is addressed below at paragraphs 76 - 79 (in relation to evidence of Paul Thomas #S58) and in my s 42A Report, including (as it bears repeating):²⁰

It remains my opinion that a range of factors necessitate specific design responses in Aokautere. The Aokautere area is a semi-developed area, has complex terrain, fragmented (existing) subdivision, specific stormwater and geotechnical parameters and developable land that is geometrically constrained. The Structure Plan stitches together existing piecemeal development areas in a co-ordinated and connected manner. In addition, PCG

¹⁷ At [177]-[179].

¹⁸ Statement of Evidence of Amanda Coats dated 3 November 2023 at [31].

¹⁹ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [83]-[89] and particularly at [87].

²⁰ At [83]-[89]. Excerpt from [84].

seeks to achieve an optimal arrangement of development in and around the new Aokautere Neighbourhood Centre. The locations of Connector Roads are also specific so as to achieve a joined-up street layout, movement 'loops' and a satisfactory level of integration with existing housing.

- [42] Mr Farquhar's concerns about housing density and demand is also addressed below at paragraphs 59 - 62 (see evidence of Paul Thomas #S58). I have also commented on this issue in my s 42A Report.²¹

Limited public transport and reliance on cars, on-site space for parking

- [43] Mr Farquhar is concerned that the of provision for public transport is not likely to reduce reliance on private motor vehicles. I have addressed this matter in my s 42A Report.²² PCG provides Urban Connector circuits that make efficient public transport routes. Explicit provision for cyclists includes on and off-road trails and improved connectivity across SH57 to Summerhill and the Cliff Road commuter route into the central city.
- [44] Compact (medium density) lots have room for a second vehicle, that is, parking is provided by an integral garage connected to or within the dwelling and a stacked parking space on the driveway. The provision of smaller blocks creates more public street environment enabling more on-street parking.

Additional Structure Plan yield vs ODP

- [45] Mr Farquhar states that the Structure Plan enables a 20% increase in yield over that currently zoned in the ODP. It is difficult to comment on the metrics without understanding Mr Farquhar's assumptions behind his yield calculations. However, if correct, a 20% increase is significant, but this is not the only reason for the Structure Plan approach. PCG delivers greater housing choice that would otherwise be less likely to occur under the ODP. The public realm is improved e.g., houses address the street (avoiding deep infill conditions) and where possible houses don't 'turn their back' on gullies. Gully reserves are protected, enhanced and create public amenity through new recreational paths. Future development is better integrated with existing housing, a

²¹ At 'Insufficient density' at [97]-[98], and 'Excessive density' at [105]-[107].

²² At [137](a)-(e).

comprehensive approach to suburban reserves is achieved and Aokautere, as a whole, acquires better spatial structure including more connectivity.

G. RESPONSE TO SUBMITTER #58 EVIDENCE OF PAUL THOMAS

Quality of existing development

- [46] Mr Thomas states that Council points to the low quality of existing development at Aokautere as reasons for establishing PCG. Mr Thomas also blames poor connectivity on deficient Council planning practices over last 30 years and further argues that Council could have used controlled activity status for subdivisions to direct outcomes.²³
- [47] Section 7 (Subdivision) Rules for Controlled Activities (R76.1.1) offer limited control over roading connections into adjoining areas or considering wider contextual matters. As noted by Mr Thomas, Rules focus on the layout of lots and the location and design of access.²⁴ In my experience this does not open up sufficient scope to encourage an applicant to allow for future development in adjoining areas or to consider wider masterplanning outcomes. I maintain that a shortcoming of Aokautere development to date is the piecemeal approach resulting in a "lack of connectivity at the interface", as agreed by the submitter and contrary to good practice.²⁵ These issues are addressed by PCG through provision of a coordinated plan that ensures piecemeal approaches are avoided and integrated design of the Aokautere suburb overall is achieved.
- [48] In my s 42A Report I have identified other shortcomings of existing development including the tendency to create cul-de-sacs, the lack of variety in housing types and the occurrence of deep rear lots serving multiple dwellings.²⁶
- [49] I also refer to my s 42A Report that describes the design approach and principles that underpin the Aokautere plan and address previous shortcomings.²⁷

²³ Statement of Evidence of Paul Thomas dated 27 October 2023 at [31].

²⁴ At [32].

²⁵ Urban design best practice promotes integrated, connected approaches. See People+Places+Spaces – A design guide for urban New Zealand, MfE, 2002, page 1 'Integration and connectivity'.

²⁶ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [153]-[156].

²⁷ At [32]-[33].

Gully protection

- [50] Mr Thomas states that Council identifies protection of the gully system as another reason for PCG. However, Mr Thomas argues that Aokautere would not exist as a greenfield residential area without filled gullies, noting that both Pacific Drive and the proposed North Village are on filled sites.²⁸
- [51] In my view, the remaining gullies are a signature feature of Aokautere and form a coherent system with existing and future ecological and amenity value.
- [52] The gully system is not just an ecological and landscape resource. As a spatial structure, it helps to organise access and correlates with land suitable for development from a geotechnical point of view. Refer also to my s 42A Report that comments on Landscape/Ecology/Stormwater approach to gullies.²⁹
- [53] At paragraphs 72 - 74 below I identify the need to consider the gully system as a whole.

NPS-UD and urban design

- [54] Mr Thomas states that the National Policy Statement on Urban Development 2020 (**NPS-UD**) mentions access and housing variety but not urban design matters when describing the planning decisions that - at a minimum - must contribute to well-functioning urban environments.³⁰
- [55] Urban design is a means for delivering accessibility and housing variety and creates the framework within which land use and access can be considered together. It is well established in urban design literature (e.g. Shaping Neighbourhoods, Barton et al. 2003) that accessibility and density (that generates housing variety) are inter-related and it is the urban design agenda that has brought these matters together for planning and legal instruments to guide development.

²⁸ Statement of Evidence of Paul Thomas dated 27 October 2023 at [35].

²⁹ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [35].

³⁰ Statement of Paul Thomas dated 27 November 2023 at [42].

NPS-UD allows change and negates landscape-led approach

- [56] Mr Thomas suggests that the NPS-UD requires amenity led adverse effects to be disregarded.³¹
- [57] While I have no comment on the proper interpretation of the policy, I consider that gully protection and the wider landscape-led approach is not just about 'amenity'. Aokautere's spatial structure based on gullies encompasses ecology, movement, stormwater management, landscape considerations, and response to slope stability. Amenity is a by-product of this integrated landscape-led approach.
- [58] Amenity derived from landscape and open space also improves yield by enabling higher density opportunities near open space and increasing value from proximity / outlook.

NPS-UD requires variety but not all housing types in all locations

- [59] Mr Thomas states that the NPS-UD requires variety of housing but does not require all types in all locations. Further, that it is inappropriate to require all types of housing in PCG because Aokautere is remote from the central city and its amenities.³²
- [60] I address the general topic of housing density and variety at various points in my s 42A Report, including:
- (a) Lot distribution: Density overlays should be retained to achieve housing variety and provide higher (walkable) population densities around the proposed Local Centre.³³
 - (b) Location for residential development: Aokautere is an identified growth area and only 1km further from city centre than other main growth opportunities. Active modes of travel to the proposed and existing centres are supported.³⁴

³¹ At [44].

³² At [51]-[52].

³³ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [54].

³⁴ At [78].

- (c) Excessive density: Medium density supports diversity in household composition and adds variety to Aokautere's built fabric.³⁵
- (d) Walkable services / amenities Submissions: Services will be available within the Aokautere Local Centre. Access to additional amenities at Summerhill will improve. Compact and permeable block/street layout increases walking access to services that are also accessible via active modes.³⁶

[61] Aokautere represents a significant proportion of scarce greenfield residential capacity and I consider there is no good reason why the Council should ignore the directives of the NPS-UD and ensure that it offers greater housing choice. Newly built compact dwellings in high-amenity greenfield locations is itself an extension of choice i.e., compact dwellings should not be limited to brownfield or infill sites.

[62] A range of dwelling types in each location helps to achieve a more diverse residential population and demographic and with smaller lot sizes and dwellings offers variation in price point.

Future need for medium density housing vs current demand

[63] Mr Thomas notes that residential development at Aokautere is occurring now i.e., it is not 10-15 years away.³⁷ The implication being that current demand needs to be considered rather than an aspiration for future. The evidence also argues that PCG's inclusion of extensive medium density housing is not based on demonstrated demand but rather on the need to provide a catchment for the proposed Local Centre.³⁸

[64] Of relevance are points raised in my s 42A Report, including:

- (a) The Council's City Growth Plan calls for 500 new dwellings annually, with Aokautere aiming to provide 400-1200 beyond current zoning, aligning with the upper target. Compliance with the NPS-UD Policy 1 requires a long-term perspective on city growth, accommodating diverse housing types and sizes.

³⁵ At [107].

³⁶ At [122]-[123], [126]-[127], [129].

³⁷ Statement of Evidence of Paul Thomas dated 27 October 2023 at [53].

³⁸ At [54].

- (b) The Structure Plan aligns with evidence-based growth projections ensuring consistency with evidence-based Growth Plans.³⁹ Accordingly, Aokautere's development aligns to projected new housing demand.
- (c) The NPS-UD obliges Council to enable stand alone and attached dwellings and smaller dwellings, reflected in the HBA's indication of high demand. PCG allows 10%-14% of the net residential area for medium density housing, in line with the city's housing supply.⁴⁰
- (d) The Masterplanning process favoured a mixed-density scenario over other approaches, with PCG based on this model.⁴¹

[65] The proposed Local Centre also supports the advent of medium density Housing (also refer to Mr Cullen's evidence re symbiotic relationships) so the relationship between the two is synergistic.⁴² The local centre isn't just a 'nice-to-have' – it supports walkable communities, reduces vehicle dependence, supports public transport, encourages active modes, promotes a sense of place and fosters social interaction.

[66] Minimum density is the issue, not maximum yield possible within the medium density area. Minimum medium density development at Aokautere has been set low (25 DPH net) that does not force intense terraced or apartment type housing but is a transitional density that allows a combination of semi-detached and fully detached dwellings on smaller lots in the medium density zone. This is a much less 'directed' outcome and I suspect submitters have not fully tested the prescribed density level but are reacting to the term 'medium density'. At **Attachment B** I provide a series of studies that demonstrate what a range of densities look like, including the lowest 25DPH outcome and ranging up to 51DPH and 63DPH. These indicate flexibility remains at the scale of individual lots and outcomes can be varied as part of future resource consents.

³⁹ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [88].

⁴⁰ At [96], [105]-[106].

⁴¹ At [27]-[31].

⁴² Statement of Reply Evidence of Michael Cullen dated 28 November 2023 at [15].

- [67] Housing on the promontories has been changed to standard residential with medium density development being ‘enabled’ rather than ‘required’ as per other multi-unit residential development (MUHA) across the city.⁴³
- [68] Overall, I maintain that PCG provides for a variety of suburban and medium density outcomes, with a view to encouraging diversity.⁴⁴
- [69] In relation to housing feasibility, I refer to the property evidence of Ruth Allen and Gareth Nicholl who have confirmed the feasibility of medium density housing at Aokautere based on 2021 values.⁴⁵

Flexible approaches including smaller Private Plan Change

- [70] Mr Thomas considers that precedents exist for alternative approaches to planning for development at Aokautere. These include small private plan changes (e.g. Matangi) and Outline Development Plans (e.g. Canterbury).
- [71] I would note one issue with smaller private plan changes being Aokautere’s ownership structure i.e., several major landowners exist but a single (macro-scale not micro-scale) gully-based spatial structure and stormwater strategy is proposed. This would require more complex coordination across a number of smaller plan changes. Mātangi (Whiskey Creek) referred to by the submitter is a discrete development with defined / absolute boundaries and does not rely on coordination with adjoining proposed development.

Gullies with medium or high value only should be protected

- [72] Mr Thomas considers that only gullies with medium or high ecological and landscape value should be protected and that elsewhere (low value gullies), other development options should be considered.⁴⁶
- [73] The collection of gully systems as a whole has integrity. As a system, the gullies help to shape access, reinforce Aokautere’s unique identity, provide recreational paths in some

⁴³ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [47], [87].

⁴⁴ At [87].

⁴⁵ At [98].

⁴⁶ Statement of Evidence of Paul Thomas dated 27 October 2023 at [70]-[73].

cased and provide and stormwater management functions. I do not consider it appropriate to look only at the merit of an individual gully but rather the totality needs to be considered.

[74] I am aware through the ecological evidence of Dr Forbes that even degraded gullies can acquire ecological and landscape value if vegetation is restored.

[75] I note that Mr Thomas' later comments that are specific to Abby Road Gully are also relevant to this point.⁴⁷ I note that Mr Hudson and Dr Forbes' opinions support this area being preserved without being filled in, and I support this. From an urban design perspective, the existing gully systems (i.e. those remaining parts that have not already been filled in) contribute to Aokautere's unique identity.

Prescriptiveness of the Local Centre

[76] Mr Thomas states that an illustrative plan for the local centre is acceptable but believes the Precinct Plan and/or designated Local Business Zone are too prescriptive. Instead, he considers it is preferable to indicate a general location for a centre on residentially zoned land, like other structure plans in District Plan section 7A.⁴⁸

[77] In my opinion, the Local Centre is too important to be left as an abstraction. A number of attributes combine to create a successful Local Centre. To achieve these attributes, elements and relationships need to be set out in some detail and this provides greater certainty to developers and future residents.

[78] The Local Centre is unlikely to be delivered as a 'one-off' single development. A Precinct Plan is necessary to coordinate multiple projects over an extended period.

[79] I have commented on the Aokautere Neighbourhood Centre in my s 42A Report:⁴⁹

- (a) the 'Superette' re-classified as 'anchor store' to increase flexibility;
- (b) the minimum net residential density has been removed to enable different types of centre development;

⁴⁷ Statement of Evidence of Paul Norman Thomas dated 27 October 2023 at [123]-[128].

⁴⁸ At [98].

⁴⁹ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [41](a)-(b), [163]-[164].

- (c) an explicit plan helps to facilitate mixed-use development and achieve favourable front-to-back and service access relationships with housing; and
- (d) some local centre provisions have been expressed more clearly. Clear direction is necessary to support good design in places that are focal points for the community (refer to poor centre design outcomes at paragraph [164] of s 42A Report).

Retirement Village roading layout

[80] Mr Thomas states there is no need for a “specified road layout” for the retirement village.⁵⁰

[81] I have already commented that the roading system proposes ‘fixed’ and ‘flexible’ street types and locations.⁵¹ Those streets affecting the retirement village (Urban Connector and Local Road and Private Road) are classified as flexible.⁵²

[82] At the same time, certain street / plan attributes are important if the retirement village is to be an integral part of North Village. These include:

- (a) Continuation of the formal planning / layout grid;
- (b) Off-site connections;
- (c) Some clear through-routes;
- (d) Outward facing units; and
- (e) Legibility.

[83] See also comments in my s 42A Report at paragraphs [165]-[168] as noted above.

Cross gully route slope and alignment for active modes

[84] Mr Thomas contends that the cross gully (Gully 1) route is too steep and circuitous to benefit pedestrians and cyclists.⁵³

⁵⁰ Statement of Evidence of Paul Norman Thomas dated 27 October 2023 at [107].

⁵¹ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [49]-[50].

⁵² At [53], [86].

⁵³ Statement of Evidence of Paul Norman Thomas dated 27 October 2023 at [115].

- [85] Convenience is not the only criterion here. The route increases resilience and contributes to a network of recreational circuits that benefit joggers, dog walkers, etc. The gully crossing also has amenity value for pedestrians and cyclists because it brings users into direct contact with the gully landscape, including off-road trails.
- [86] As previously noted, Urban Connector Types C and D are ‘flexible’ and the alignment (vertical and horizontal) may change subject to more detailed civil engineering work.
- [87] Further, it is not my understanding that an extension to Alan Miers has been given resource consent by Palmerston North City Council.

Medium density housing within walk of a smaller centre

- [88] Mr Thomas states that medium density housing should be within “easy walking distance” of a “smaller neighbourhood centre” and is generally concerned about PCG directing / requiring medium density housing at North Village.⁵⁴
- [89] I agree with Mr Thomas that medium density housing should be within an easy walk of local centre amenities. To this end a 400m ped-shed has been taken as the basis for medium density housing within an ‘easy walk’. 400m is a distance that is recommended in urban design literature (Shaping Neighbourhoods, Barton et al. 2003, page 201). I have also stated in my s 42A Report that alternative arguments for locating medium density housing relate to proximity to exceptional amenity such as direct visual and physical access to high quality natural environments.⁵⁵
- [90] I have previously addressed the topic of housing density at paragraphs 59 - 69 of this written reply and for the sake of brevity refer to those paragraphs. Also see previous responses regarding the Local Centre.

⁵⁴ Statement of Evidence of Paul Thomas dated 27 October 2023 at [143].

⁵⁵ Section 42A Technical Report of Andrew Burns dated 15 September 2023 at [178].

Wetland feature at head of Gully 1, North Village and playable reserve

- [91] Mr Thomas states that the proposed wetland feature takes centrally located land out of public or private use and that gully reserves already cater for stormwater treatment. Also notes that a small playable reserve may be required in this location.⁵⁶
- [92] The southern end of Gully G1 is formalised as a rectangular wetland feature with an associated crescent-shaped green. These two adjacent spaces help to define the core of North Village and are important to support medium density housing through higher levels of public realm amenity (refer to Submitter #43).
- [93] The wetland feature is conceived as being part of the gully system i.e., as a formalised section of gully. Indeed, it sits within that part of Aokautere that once included a gully (I understand this has been subject to uncompacted fill). At its northern end, the wetland feature is contiguous with G1. It brings gully access into the heart of North Village, connecting with the end of the Local Centre, provided that such areas can be developed safely for children.

H. RESPONSE TO SUBMITTER #61 EVIDENCE OF PEPA MOEFILI

Peri-Urban Road alignment

- [94] Mr Moefili notes that the Peri-Urban Road connecting to Turitea Road is to give access to PCG's Rural Residential areas.⁵⁷ The evidence recommends that the Structure Plan includes a notional connection to the north-east of Mr Waters' land where future rural residential development could occur. This is identified in Appendix B of Mr Moefili's evidence titled 'Notional Roding Link'.
- [95] The proposed route (Mr Moefili's evidence Appendix B) follows an existing farm track. This branches off the existing reservoir road and crosses proposed gully reserve G16. The reserve and associated stream link F1 and F2, areas of forest that are recommended to be 'retired, protected and restored'. So, there are sensitive ecological

⁵⁶ At [147].

⁵⁷ Statement of Evidence of Pepa Moefili dated 27 October 2023 at [3.7]-[3.94], and [4.5].

issues to be considered. Nevertheless, I support the request to include a roading link or access point⁵⁸ within the Structure Plan.

- [96] Geotechnical / ecological testing might affect the eventual alignment, however I note the Peri-Urban Road type is flexible and precise position can be resolved at future resource consent stages.

Urban Collector Road alignment and zoning change

- [97] Mr Moefili seeks a change to the proposed zoning for a small northern portion of Mr Waters' land, changing this from Residential to Rural Residential.⁵⁹ I am comfortable with this change and support the request.
- [98] Associated with this change is a request to realign the Urban Connector such that it is located within Mr Green's land to provide access to the residentially zoned spur of land to the south-east of Mr Green's landownership. Appendix C of the Mr Moefili's evidence refers to these requests and a similar roading request is made by submitter #45 and I refer to my response at paragraph 23.

I. CONCLUSION

- [99] I have reviewed all submitter evidence relevant to my area of expertise (urban design). I remain of the view that PCG as set out in the s 42A documentation provides successful urban design outcomes and an appropriate Structure Plan for development. However, I note the following exceptions where I agree with submitter evidence / requests and recommend changes / additions to PCG:

- (a) At the Local Centre I recommend the creation of a shared surface street space for the one-way road adjacent to the anchor store. I consider this partly addresses the request of Submitter #43.
- (b) Indicate an additional Peri-Urban roading link to the southern part of the plan to provide access to north-eastern Rural Residential land owned by Mr Waters (Submitter #61, Appendix B of Mr Moefili's evidence).

⁵⁸ Statement of Reply Evidence of Harriet Fraser dated 28 November 2023 at [14].

⁵⁹ At [3.10]-[3.12.4].

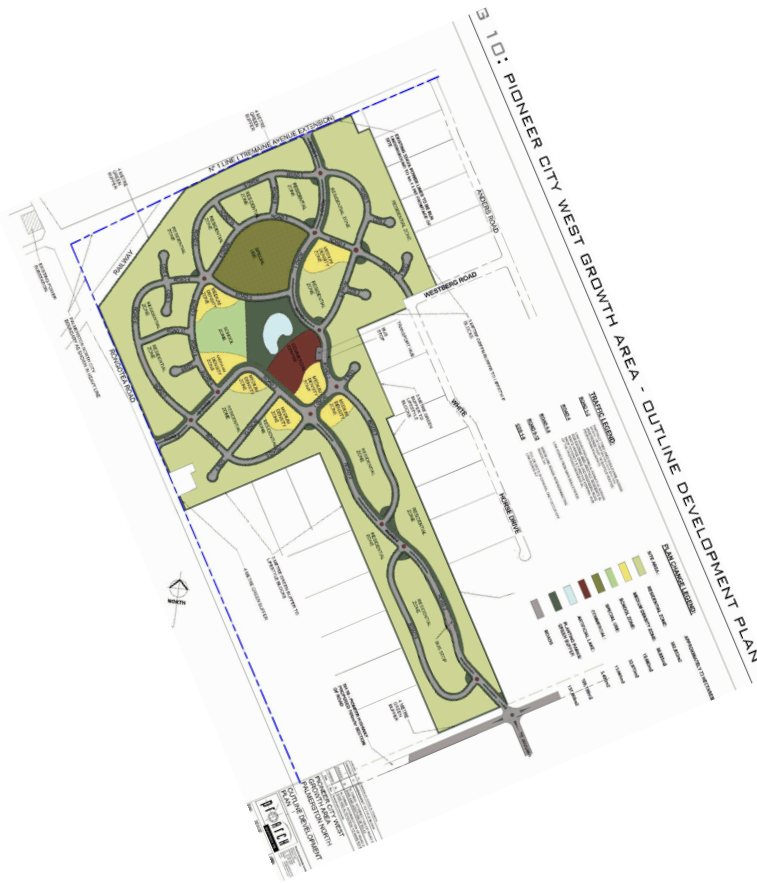
- (c) Adjust access and zoning to a small portion of land at the interface between land owned by Mr Green and Mr Waters (Submitter #61, Appendix C of Mr Moefili's evidence and Submitter #45).
- (d) The Terrace Link Road is already a 'flexible' road in terms of alignment and could be facilitated by PCG. As proposed by the submitter the Link Road could be better resolved to connect into the linear open space (see Figure 13 of my s 42A Report) that defines the northern edge of South Village.
- (e) Further information could be added to the Structure Plan drawings including existing road names (Submitter #51).

28 November 2023

Andrew Burns

J. ATTACHMENTS

Attachment A - PCWL Plan Change B – Outline Development Plan by ProArch



Distance from The Square to PCWL commercial area: 5.4km

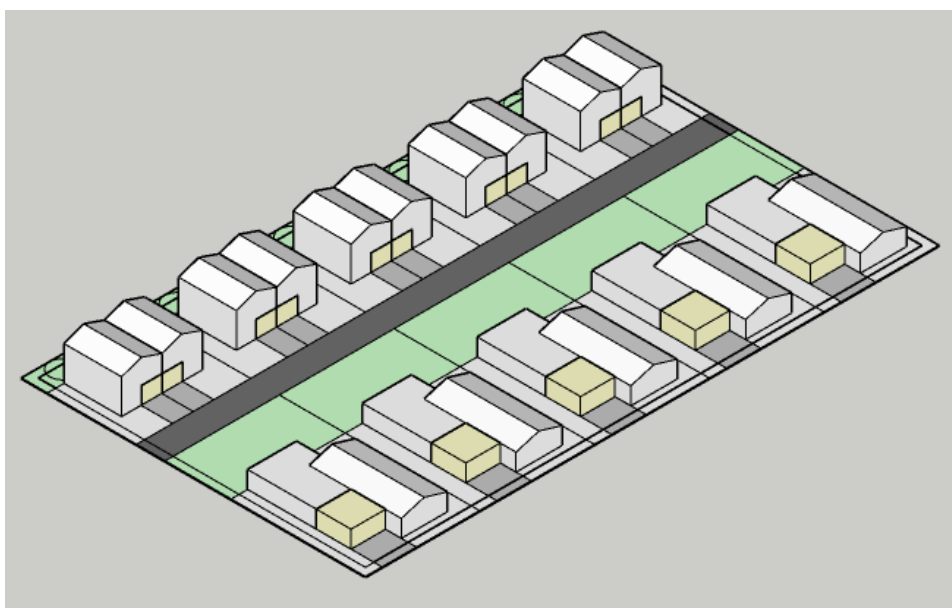
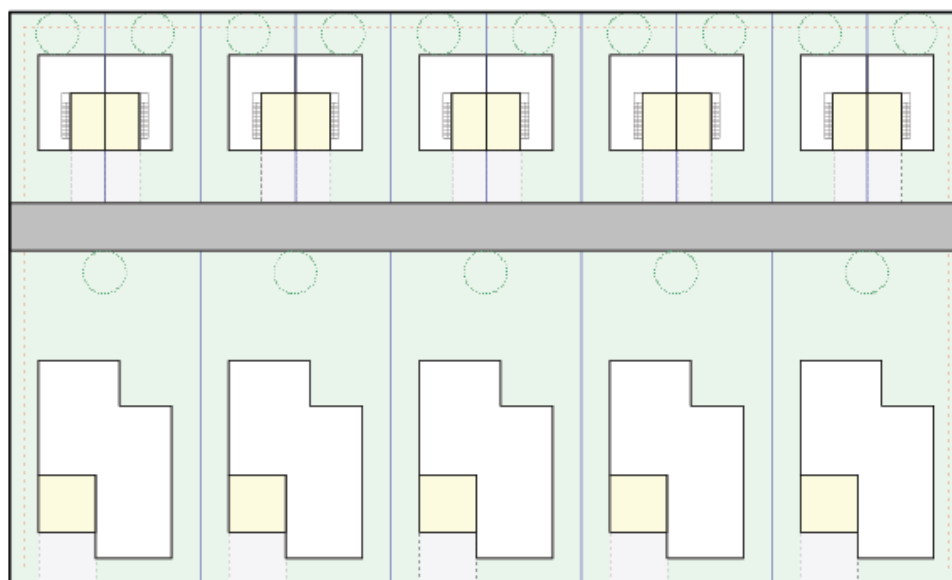
Attachment B – Medium Density Testing on typical 6,000sq.m block

25 Dwellings per Hectare (net) Option A

(mix of semi-detached and detached dwellings)

10 semi-detached dwellings + integral and stacked parking

5 detached houses + + integral and stacked parking

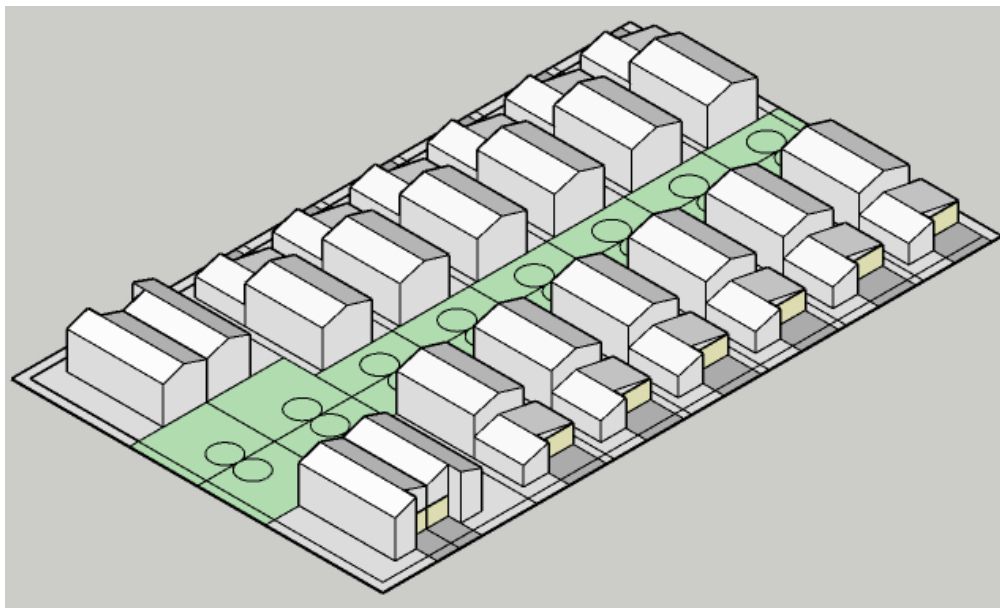
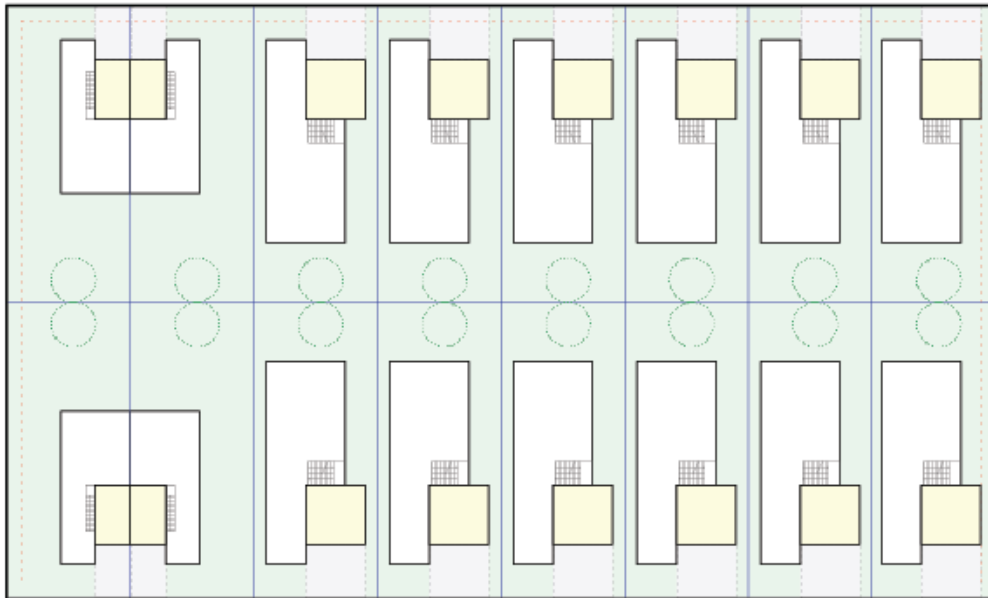


25 Dwellings per Hectare (net) Option B

(mostly detached dwellings / some mix if required)

12 semi-detached dwellings + integral and stacked parking

4 detached houses + + integral and stacked parking



51 Dwellings per Hectare (net)
(31 Semi-detached, 2 storeys / 3bed)
27 Lots @ 160sq.m
4 Lots @ 240sq.m
Access lane @ 405sq.m
Dwellings
70sq.m footprint
140sq.m GFA



63 Dwellings per Hectare (net)

(mix of semi-detached and apartment housing typologies, 2 storeys)

12 semi-detached dwellings + integral and stacked parking

38 apartments + 31 car parks

