



**New Zealand
Institute of Architects
Incorporated**

Feedback on the Draft Unitary Plan

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Submitted to:
Auckland Council
Unitary Plan Feedback Team

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The New Zealand Institute of Architects (NZIA) welcomes this opportunity to make a submission on the Draft Auckland Unitary Plan.

The NZIA, which has been in existence since 1905, is the professional body representing more than 90% of New Zealand's Architects. Almost half of these Architects live and practise in Auckland.

This submission has been prepared for the NZIA by the Auckland Urban Issues Group, which comprises members of the Institute's Auckland Branch.

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Auckland's population is growing and it is imperative that that this growth is accommodated within a quality, compact city. As a member organization representing Architects, the NZIA is acutely aware of the challenges around quality intensification. We encourage Council not to compromise quality in the interests of fast-tracked approvals – the resulting built form will survive all of us. The State House programme is a good example of how the involvement of Architects and quality builders can be influential. Auckland Council has a responsibility, which we are certain it recognizes, to ensure that a high-quality built environment is the legacy of the Unitary Plan.

The NZIA welcomes and supports the main directions of the draft Unitary Plan and its 30-year outlook. The Council is to be congratulated on preparing this plan within a challenging timeframe. Council's high-level strategies follow the direction set by the Auckland Plan, which we support and to which we actively contributed.

We agree with the Draft Plan's fundamental principle: in order to preserve both the unique physical environment of Auckland and that of the rural hinterland, it is necessary to limit the outward sprawl of the city. Although it may appear expedient to continue building new rural suburbs, the hidden cost of expanding outward is huge.

Against this cost should be weighed the enormous benefits to be gained by focusing Auckland's economic, environmental and cultural activities within existing city limits.

We endorse the concept of a compact city inside a set Rural Urban Boundary, achieving a balance between outward growth and higher densities within existing limits. We also support selective densification within the city, its satellite centres, and along transport corridors.

Auckland's volcanic cones, urban forests, harbours and waterways, and its places of heritage and character are unique and enormously valuable natural and built assets. It is essential that they be safeguarded within the Plan.

The Deputy Mayor, in leading the Planning team within Council, insists upon a democratic consultation process that involves all sectors of Auckland's community. After two and a half months, this visionary approach is gaining traction. We look forward, in the coming weeks, to discussing with Auckland Council the detail of the Unitary Plan, how

it is to be applied in practice, and how it may be modified. In the conclusion of this submission we set out our views on what in particular needs to be done, and about how we can help.

Auckland must develop as an international city with a range of choices for urban life. We believe that, allied to good design, the new Unitary Plan will present a framework that allows Auckland to flourish. We are eager to help in the realization of this ambition.

The Period of Public Consultation

Public consultation since the launch of the draft Unitary Plan on 15 March 2013 has triggered considerable community interest and controversy. In this environment the announcement on 10 May of an Auckland Housing Accord between Government and Auckland Council, and the creation of Special Housing Areas (SHAs), has the potential to send mixed signals to the market and the community.

The unavailability of the Auckland Design Manual during the consultation period has been a lost opportunity. The Design Manual could have informed practitioner input and would have been a valuable public education tool that could have served to dispel some public misgivings about intensification and its effects. The absence of the Design Manual makes it harder to confirm the 'quality' of the potential built form under the Unitary Plan.

Council has a six week window to consider all the feedback on the Draft Plan before the Proposed Plan must be finalized in order to meet the September notification date. Some consider this deadline allows Council staff insufficient time to give meaningful consideration to, and amend as appropriate, the Plan. There are calls for Council to push the notification date out by three to four months. We take the opposite view. With determination, and some decisive adjustments, the Unitary Plan can and should be kept on track.

In the Introduction to the Auckland Plan, Mayor Len Brown states: "Each community will consider the appropriate degree of compactness and level of intensification that goes with this. Our emphasis is to build on local character, and to create vibrant, creative places and inclusive communities." It is clear, from the public response so far, that the draft Unitary Plan will only gain wide-spread community support by incorporating some essential changes. It is only then that this 30-year plan will start achieving results in the short-term, as well as establishing the strategies required for the long-term.

The previous 'top-down' model of planning, in which the planners' will is imposed on communities, can be combined with a grass roots, 'bottom-up' approach that harnesses communities' views and initiatives. The architectural profession finds itself uniquely well placed to help navigate a way forward.

Organization of this Submission

This submission is structured under three platforms:

Platform One:

Stimulating
Effective
Intensification

The drive to a compact, more intensive city presents us with huge social, environmental, economic and cultural opportunities. Change is inevitable; how successfully change is managed will only become manifest one small step at a time – building by building, neighbourhood by neighbourhood. The details are not just details.

Platform Two:

Enhancing
Auckland's
Unique
Character

We must steadfastly hold on to the unique character of Auckland. To preserve is not enough; we must set out to actively enhance Auckland's special character.

Platform Three:

Fostering
Creativity
and Quality

There is to be a new spirit: one unified city with a single administration, in partnership with its communities. In this spirit, we need to find a new way to put the Unitary Plan into practice. In order to be successfully realized, the Plan must be clearly communicated and understood, and it must be supported by Aucklanders in general.

Platform One: Stimulating Effective Intensification

4.1 The Compact City

We support the philosophy of the 'quality compact city' model adopted by the draft Unitary Plan. Other parts of this submission address 'quality'; this section focuses on compactness.

Part 2 Regional Policy Statement Sections 2.1 and 2.2

1. **We support** Regional Policy Statement (RPS) 2.1.2 Urban Form

"A sprawling urban form may supply additional land but will have cost implications:

- infrastructure costs rise*
- land use is inefficient*
- traffic congestion increases*
- people in outlying areas spend more of their household income on travel*
- capacity constraints on servicing new communities*
- loss of rural production"*

2. **We support** the RPS 2.2.1 Objectives 1 and 2

- "1. A quality compact urban form with a clear limit (Rural Urban Boundary-RUB) to the urban expansion of the metropolitan area, satellite towns, rural and coastal towns and serviced villages*
- 2. The primary focus for urban growth, outside of existing urban areas, is greenfield land within the RUB that is contiguous with urban area and the satellite towns of Pukekohe and Warkworth"*

3. **We support** the RPS 2.2.1 Policies 1 to 3f

- "1. Concentrate urban activities within:*
 - a. the RUB around the metropolitan area, the satellite towns, rural and coastal towns and serviced villages*
 - b. the urban zones of the un-serviced rural and coastal villages.*
- 2. Increase the density of residential development in neighbourhoods which are:*
 - a. within moderate walking distances from the city, metropolitan, town and local centres*
 - b. in areas close to the frequent public transport network*
 - c. in market attractive areas or in close proximity to large parks and reserves or community facilities and services*
 - d. adequately serviced by existing physical infrastructure or where infrastructure can be upgraded efficiently*
 - e. not prone to the impacts of natural hazards or which if further developed, are not likely to cause flooding or instability elsewhere or where such constraints cannot be economically remedied.*
- 3. Provide for and encourage residential intensification within and around centres while ensuring that:*
 - a. land immediately adjacent to the city, metropolitan, town and local centres is the primary focus for higher residential intensification*
 - b. centres are as compact as practicable relative to their role and hierarchy of centres*
 - c. there is a broad mix of activities within centres*
 - d. residential activity does not compromise the ability for commercial activities to locate in centres*
 - e. the redevelopment of sites to a higher density and land efficiency is encouraged*
 - f. opportunities for promoting mixed use developments within centres are not compromised"*

4. **We seek amendment** of RPS 2.2.1 Policy 2c to include the amenity offered by adjacency to the coast to recognize that land adjacent to the Waitemata and Manukau Harbours has high amenity values, including recreational and visual amenity, that can appropriately support intensification. With the high cost inherent in apartment development it is these high amenity areas with their subsequent high land values, where intensification can respond to market drivers, sooner rather than later.

5. **We support** RPS 2.2.3 Supply of urban land; objectives 1-4

- "1. Sufficient supply of land and development capacity to enable urban growth.*
- 2. 60-70 per cent of total new dwellings up to 2040 occur within the existing metropolitan urban area.*
- 3. 30-40 per cent of total new dwellings up to 2040 occur outside the existing metropolitan urban area.*
- 4. Urban development of greenfield land within the RUB occurs in an orderly, timely and planned manner."*

6. **We do note** however that:

- a. Subsections 2 and 3 are a softening of the originally proposed 70/30 per cent split
- b. If it were to eventuate that 40% of new dwellings were to occur outside of the existing metropolitan urban area, this would represent some 160,000 of the projected 400,000 houses being built outside the city, which calls into question how compact the city would be at that point
- c. Further softening of this ratio should not be allowed to occur

With recent opposition to the compact city model gaining increasing coverage in the media, Council needs to remain committed to the model to ensure we get the level of intensification required to support a modern urban city.

7. **We support** RPS 2.2.3 Supply of urban land; Policies 1-8

- "1. Ensure that there is 20 years' planned forward supply of urban development capacity at all times.*
- 2. Maintain sufficient capacity of unconstrained land within the RUB to accommodate an average of seven years of urban growth at any one time.*
- 3. Allow RUB extensions, by way of plan changes, within areas generally identified in the Draft Auckland Unitary Plan Addendum: Part I The Rural Urban Boundary, only after sufficient investigations have demonstrated the land is suitable for urban development and where possible urban development can avoid:*
 - a. areas with significant environmental, heritage, natural character or landscape values, including areas identified in Appendix 3, Appendix 5, Appendix 6 and the Waitakere Ranges heritage area*
 - b. scheduled areas, features or sites of significance to Mana Whenua*
 - c. areas of mineral resources*
 - d. elite land*
 - e. areas prone to natural hazards.*

Where urban development cannot avoid locating in these areas, it must be done in such a way that individually or cumulatively manages environmental and natural hazard constraints to mitigate any significant adverse effects."
- 4. Continue to use greenfield land within the RUB for rural activities until urban zonings are applied, provided that subdivision, use and development does not compromise the future urban use of the land and avoids land fragmentation.*
- 5. Undertake a sub-regional analysis to identify greenfield land within the RUB to prioritize areas for structure planning and subsequent land release, based on the following:*
 - a. current and future supply of, and demand for residential and business land*
 - b. the urban form and range of housing choices desired for the area*
 - c. infrastructure provision and sequencing*
 - d. linkages and integration with existing urban areas*
 - e. optimum sequencing and release of land over time.*
- 6. Require the provision or upgrading of significant infrastructure to be co-ordinated with the structure and sequencing of growth and development, and planned and funded prior to the approval of an activity and/or development.*
- 7. Stage the release of greenfield land within the RUB for urban development in a planned sequence in accordance with the following principles:*
 - a. land should be released following the approval of a structure plan prepared in accordance with Appendix 1 and the urban zonings introduced by way of plan changes*
 - b. release will be done in a logical sequence with new areas released only after earlier areas have started development*
 - c. new urban growth within the RUB should be immediately adjacent to existing urban land unless the separation is necessary to:*
 - i. avoid, remedy or mitigate significant conflict between activities*
 - ii. create distinct towns and villages*
 - iii. ensure the efficient provision of infrastructure, including transport*
 - iv. take account of the topography or other physical constraints*
 - v. avoid the areas outlined in Policy 3 above*
 - d. land released should maintain sufficient development capacity for both business and housing in each sector i.e., north, west and south*
 - e. the quantity of land being released at any one time will have regard to the scale and economies of servicing and developing the land.*
- 8. Release greenfield land within the RUB for urban development without a structure plan only in the following circumstances:*
 - a. it is a minor extension of no more than 10ha that completes an existing neighbourhood and does not create a new neighbourhood or extend collector or arterial roads*
 - b. the extension will not be or lead to a cumulative series of such extensions*

- c. *the extension does not compromise the intended development of future urban areas*
- d. *it can be demonstrated that all necessary infrastructure, (both within the extension and upgrades required outside the extension), is planned and funded*
- e. *a concept plan is included within the plan change*
- f. *the area is able to be served by a range of transport modes, particularly public transport.”*

8. **We note** the announcement on 10 May of an Auckland Housing Accord between Government and Auckland Council that will result in the creation of legislation for Special Housing Areas (SHAs). The legislation is intended to provide for the fast-tracking of consents for greenfields developments of more than 50 houses or lots in designated SHAs outside the existing urban boundary with less scrutiny than was hitherto intended.

Whilst we are generally supportive of initiatives to speed up the supply of land for housing, we are concerned that the accord appears to raise the spectre of a much less planned approach to the expansion of the RUB than section 7 (a, b, c) anticipates, and may well undermine the compact city policy. We note that the decisions of the Council -appointed hearings panels will not be subject to appeal; this puts a much greater onus on the quality of decisions to be made under this process.

We seek reassurance that prioritization be given to the creation of SHAs within the RUB rather than beyond the RUB in a logical planned manner, rather than creating an ad hoc response with unintended consequences, particularly in relation to the provision of infrastructure, including social infrastructure.

9. **We support** RPS statement 2.2.4 Neighbourhoods that provide housing choice, objective 1 and policies 1 & 2:

“Objective

- 1. *A range of well-designed housing choices that are appropriate for the diversity of the population.*

Policies

- 1. *Provide opportunities for a mix of housing choices to reflect cultural needs, age, household size and income.*
- 2. *Enable the efficient use of land to increase the supply of housing within neighbourhoods.”*

According to Statistics New Zealand it is expected that by 2031 more than 50% of households will be either one or two person households. Already that demographic accounts for a large portion of our population, yet most of our new houses are being built for larger households. For the past three years the floor area for the majority of dwellings in Auckland has been greater than 200m². This, it appears, is what happens when the majority of residential land is zoned and subdivided to suit family homes rather than terrace houses or apartments.

We understand it is proposed that 49% of the Auckland metropolitan area is zoned Mixed Housing (MH) and 7% zoned Terrace Housing and Apartment Buildings (THAB). We seek assurance that a rigorous analysis of the areas zoned MH and THAB will be undertaken to ascertain that there is, in fact, real capacity to deliver the needed uptake in those zones. We fear that any reduction in the current proposed MH or THAB zoning will seriously compromise the Council's ability to provide for planned growth, or deliver on the compact livable city vision.

Section 3.2 Zone objectives and policies

- 10. **We support** 3.2.1.1 General objectives and policies for the residential zones
- 11. **We support** 3.2.1.2 Single House Zone Objectives and Policies
- 12. **We support** 3.2.1.3 Mixed Housing Zone Objectives and Policies

However, we do have concerns about Objective 4 – “Development is of a scale, form and appearance that responds to the site and neighbourhood’s suburban residential context.”

We note that zone description reads: “This zone encourages new development patterns by providing increased housing densities with the highest density levels on large sites with wide road frontages.” This statement is appropriate because the Mixed Housing Zone is the one which will need to carry a substantial portion of the required intensification of Auckland City. There is an obvious tension between responding to existing character (as required by Objective 4), which may in fact encourage a design response to very poor quality existing built character, e.g., a suburb dominated by ‘sausage flats’, and the responsibility to show design leadership in creating a new positive character for some neighbourhoods.

We seek a re-wording of Objective 4 to require a response to existing character only when that character is positive and in accordance with a direction that Council wishes taken

for future development, such as that used for the THAB zone where the corresponding objective refers to “the neighbourhood’s planned urban residential character.”

We have the same concern relating to Policy 4, which “require[s] development of five or more dwellings to integrate into the neighbourhood...” If “integrate” were to be interpreted as visual integration, then it would set up the same type of problem outlined above. We seek further clarification about the type of Integration intended by Policy 4.

Capacity of zoned land to deliver 280,000 dwellings within the RUB

13. **We note** it is Council’s intention that 280,000 new dwellings be built within the existing metropolitan area by 2040. We are concerned that it appears that the necessary analysis to establish that the zoned area is capable of delivering that degree of intensification over a 27-year period has not yet been completed. In the absence of that information it is difficult to see that Council has sufficient data to correctly determine zonings and zone boundaries. We submit that Council completes this study and makes it publicly available prior to formal notification of the Unitary Plan later this year.

Maps

14. Zone Maps

The study we have made of the planning maps included in the Draft Unitary Plan indicates that there are many instances where scope for intensification has not been pursued and, to a lesser extent, instances where less intensity would have been preferable.

The significance of not having taken opportunities for intensification is yet to be established because of the absence of the data (referred to in section 7 above) that would confirm (within reasonable limits of certainty) that 280,000 dwellings could be accommodated within the existing metropolitan area within the required timeframe.

We do, however, consider that the prudent policy with respect to the zoning maps at this stage would be to zone all the opportunities for intensification that seem reasonable. Not to do so risks sending a message to the community that there are significant areas of metropolitan Auckland that will not be subject to change that, indeed, may well have to change.

Our analysis of a very limited number of locations has indicated that there may well be a very significant under-utilization across the metropolitan area. This under-utilization appears to fall into the following groupings:

14.1 Inappropriately Low Provision For Density Around A Town Or Metropolitan Centre

RPS 2.2.1 Policies 2 states:

“Increase the density of residential development in neighbourhoods which are:
a. *within moderate walking distances from the city, metropolitan, town and local centres”*

[Refer to **Appendix, examples 1–5**, which show several instances where this policy has not been followed in the zoning of land that is clearly within walking distance of a Town or Metropolitan Centre.]

We seek review of the zoning applying to these areas and others like this to allow these areas to participate effectively in the intensification of Auckland

14.2 Land Adjoining a Public Transport Route Not Utilized for Intensification

RPS 2.2.1 Policies 2a states:

“Increase the density of residential development in neighbourhoods which are:
b. *in areas close to the frequent public transport network*

[Refer to **Appendix, examples 9–15**, which show several instances where this policy has not been followed in the zoning of land that is clearly within walking distance of an existing or proposed transport node. Most of the examples shown are of under-utilization around train, bus and ferry stations, not just locations close to road transportation routes.]

We seek review of the zoning applying to these areas and others like this, to allow these areas to participate effectively in the intensification of Auckland.

14.3 Land Adjacent To Physical Or Visual Amenity Not Utilized For Intensification

RPS 2.2.1 Policies 2c states:

“Increase the density of residential development in neighbourhoods which are:

- c. in market attractive areas or in close proximity to large parks and reserves or community facilities and services.”*

[Refer to **Appendix, examples 17–20**, which show several instances where this policy has not been followed in the zoning of land that is adjacent to high quality parkland or reserves. We have also included instances where adjacency to the coast has not been utilized for intensification, because, as noted previously in this submission, we consider that the omission of coastal amenity from policy 2c needs amendment. This is where the market would invest in intensification projects sooner rather than later. The cost of the land in these areas will ensure a high quality product is produced, setting good design examples for other lower land value areas.]

We seek the amendment of Policy 2c to read

“Increase the density of residential development in neighbourhoods which are:

- c. in market attractive areas, adjacent to Waitemata or Manukau Harbour or in close proximity to large parks and reserves or community facilities and services”*

14.4 Land in Market-Attractive Areas Not Utilized For Intensification

RPS 2.2.1 Policies 2c states:

“Increase the density of residential development in neighbourhoods which are:

- c. in market attractive areas or in close proximity to large parks and reserves or community facilities and services”*

[Refer to **Appendix, examples 33–36**, which show several instances where this policy has not been followed in the zoning of land that lies within areas that are well known to be attractive to the property market. Some of these instances may well be the result of zoning policy discussed in 9.5 and 9.6, but there appears to be no reason for these policies not to be reviewed.]

We seek review of the zoning applying to these areas and others like this, to allow these areas to participate effectively in the intensification of Auckland.

14.5 Planning Map Overlays Effectively Preclude Intensification

A planning map overlay has been used to control the demolition of houses constructed before 1944. Whilst we well recognize the importance of protection of our built heritage our analysis shows that this overlay has been applied in a very blanket approach over vast areas of some suburbs, regardless of actual heritage value being highly variable, which effectively places significant obstacles in the path of these suburbs participating in the intensification of Auckland.

[Refer to **Appendix, examples 23–24**, which show how this control has been applied in a blanket manner.]

Of particular concern is any overlay affecting HNZN properties as this is where Council has the opportunity to work with a single owner, with contiguous property ownership, providing the best opportunity for large scale planned intensification.

We seek a more fine-grain analysis of the areas affected by this overlay to identify individual houses, streets or neighbourhoods of genuine heritage value to allow protection of those properties whilst allowing the balance of the suburb to participate effectively in the intensification of Auckland.

14.6 Large Scale “Roll Over” Of Low Density Residential Zones Compromises Intensification

The former Auckland City Council zones of Residential 1 and 2 and North Shore City Residential 3 zone have been transferred through in bulk to the Single House Zone (SHZ). The planning and urban design rationale for this is obscure (the political rationale less so). The formation of these three zones goes back to the last review of the Auckland District Plan and North Shore City Plan, respectively, many years ago. Since then all of the areas affected by those zonings have changed and in many portions of those suburbs the heritage character that the zone rules sought to protect have changed beyond recognition. It simply does not make sense for the planning document being evolved for the next thirty years to simply propagate zoning that is already well out of date.

[Refer to **Appendix, examples 37–40**, which show examples of areas within the former Auckland Council Residential 1, 2B and 5 (now Single House Zone) and North Shore City Residential 3 (now Single House Zone).]

These examples show the anomalous situation that arises where property has been “rolled over” from Res 1 into the single housing, yet adjoins land zoned for a town

centre, which RPS 2.2.1 Policy 2 (a) would require to be intensified.

We seek a fine-grain review of the areas of the single house zone that have resulted from the rollover of the former Auckland Res 1 and 2, and NSC Res 3 zone, to identify areas that should be up-zoned.

Figure 1 (below) is an example of a fine-grain analysis carried out on an area of Herne Bay, clearly demonstrating that only a portion of the street has properties of significant heritage value and that a blanket overlay is not appropriate.

14.7 Inappropriately High Provision For Intensification Around A Town Or Metropolitan Centre

[Refer to **Appendix, examples 7-8**, which show instances where land has been upzoned due to its proximity to a town or metropolitan centre, without considering other constraints or appropriateness for intensification.]

Fig. 1 – Victorian/Edwardian Buildings in Hamilton Road



General comments

1. The Unitary Plan must support the broad aims of the Auckland Plan. While the high level objectives of the Auckland Plan are reflected in the Unitary Plan's Regional Policy Statement (Part Two), and in the Objectives and Policies (Part Three), we are not convinced that the lower level Rules (Part 4) will deliver the outcomes sought by Council, at least as far as the built environment is concerned.
2. There is the opportunity to simplify the rules and, while many of the rules inherited from previous plans have been rationalized, we consider there are many remaining in the draft which appear to have been brought across without full consideration, and which need further analysis. In particular, we support the idea that, to the extent possible, the same development controls apply across the different zones.
3. **We support** the reduction in the number of residential zones. This section concentrates on the two residential zones where the broad thrust of intensification is intended to occur – the Mixed Housing zone and the Terrace House + Apartment zone.
4. **We are concerned** that the 'bigger developer with Resource Consent' scenario, with its embedded processes to lift design quality, will not deliver the numbers of new dwellings required in these zones, and that such developers will find it easier to continue a 'business-as-usual' approach to building detached houses at the urban periphery.

We recognize that less-sophisticated developers, working on 2,3 and 4-dwelling sites in the Mixed Housing zone, can play their part in delivering a quality compact city. However, there is a view that some sort of 'design-review-lite' process is needed to prevent the worst excesses of infill housing development.

5. The ability to convert one dwelling into two (clause 4.3.1.3.3) also raises concerns around quality. While the provision should result in more affordable accommodation, we are unsure how this will work in reality. The newly created dwelling can be very small (30m²), and is not required to have its separate outdoor area or carpark. With good design, this could work well for many households, but we submit that this provision should be linked to a restricted discretionary activity to avoid the worst outcomes.
6. The question of minimum dwelling size is difficult. Very small (30m²) dwellings, when well designed, can fulfill the needs of a certain demographic very well, but in other circumstances will lead to very poor outcomes, with a raft of environmental and social problems attached. Refer to the Business Section of this submission for further detail.
7. **We question** the usefulness of the four Clauses 4.3.1.5.1.2.4 to 7. These set out assessment criteria for 'development design', building interface with the public realm, carparking and access, and dwelling design. These topics encompass a wide swathe of urban design, and it diminishes their collective importance to be reduced to a couple of pages and some crude diagrams. We feel that more work is required in order that these principles are more clearly articulated.

Specific comments

8. There is a view in the urban design community that terrace houses are so different to apartments that they should have their own zone, and this proposition may warrant further testing. Such a zone could bridge the rather abrupt divisions between the Mixed Housing and Terrace House + Apartments zones.

We suggest the Mixed Housing zone could be split in two, with a less intensified part-zone along the lines of the proposed controls (but perhaps reducing building coverage back to 40%) to allow a moderate amount of infill. The other part-zone would be for intensification by predominantly terrace houses with more prescriptive rules along the lines suggested below.

There is a view in the urban design community that terrace houses are so different to apartments that they should have their own zone, and this proposition may warrant further testing. Such a zone could bridge the rather abrupt divisions between the Mixed Housing and Terrace House + Apartments zones.

We suggest the Mixed Housing zone could be split in two, with a less intensified part-zone along the lines of the proposed controls (but perhaps reducing building coverage back to 40%) to allow a moderate amount of infill. Then the other part-zone would be for intensification by predominantly terrace houses with more prescriptive rules along the lines suggested below. This part-zone may also have a lower threshold

for requiring Resource Consent than the proposed five dwellings or more; perhaps three dwellings or more should be subject to the consenting process?

However, if the introduction of a new zone is not possible, a similar outcome could be achieved by making specific provision for more intensive terrace houses in the Mixed Housing zone under certain conditions.

9. **We consider** the Terrace House typology should be promoted in the zone as a desirable method of achieving intensification through small-scale developments. This is a popular and traditional housing type, partly because each house has its own visual identity (when compared to an apartment), and it has the very attractive potential for fee simple titles and precludes the need for a body corporate.

Terrace Housing in Mixed Housing zone on sites up to 1200m²



10. To encourage Terrace Houses in the Mixed Housing zone, the following Development Controls will need to replace those currently proposed. [figures 2 and 3 below show two terrace houses on a standard 400m² (16 metres x 25 metres) residential site.] We consider this is superior urban form to the front lot / rear lot typical subdivision, as it produces a better streetscape and preserves the bigger back yards, continuous across the backs of the houses. This allows for bigger trees and avoids the wasted (and expensive) land consumed in narrow yards.

Fig. 2

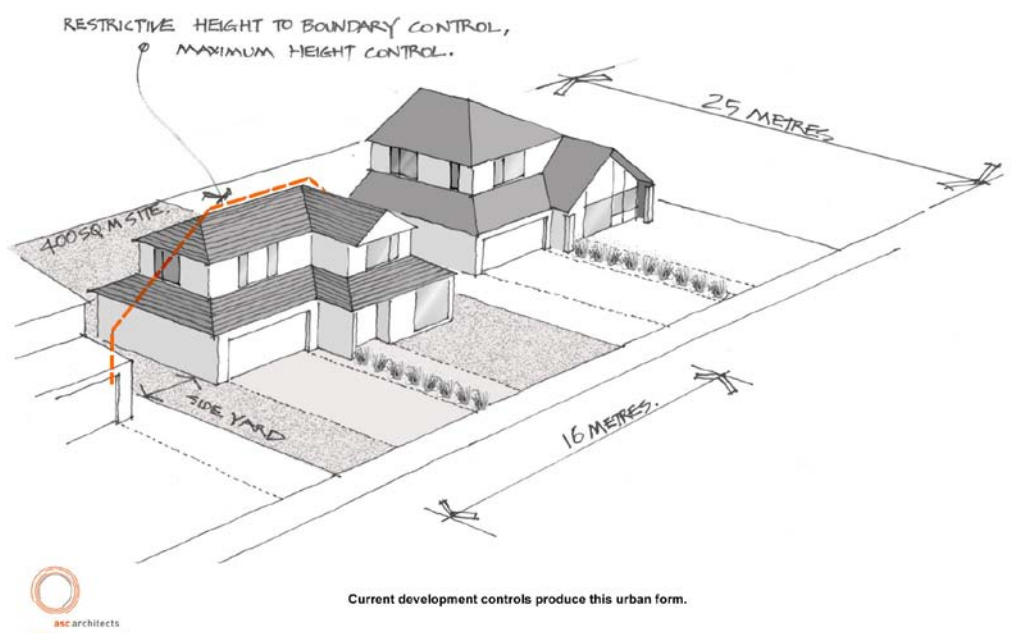
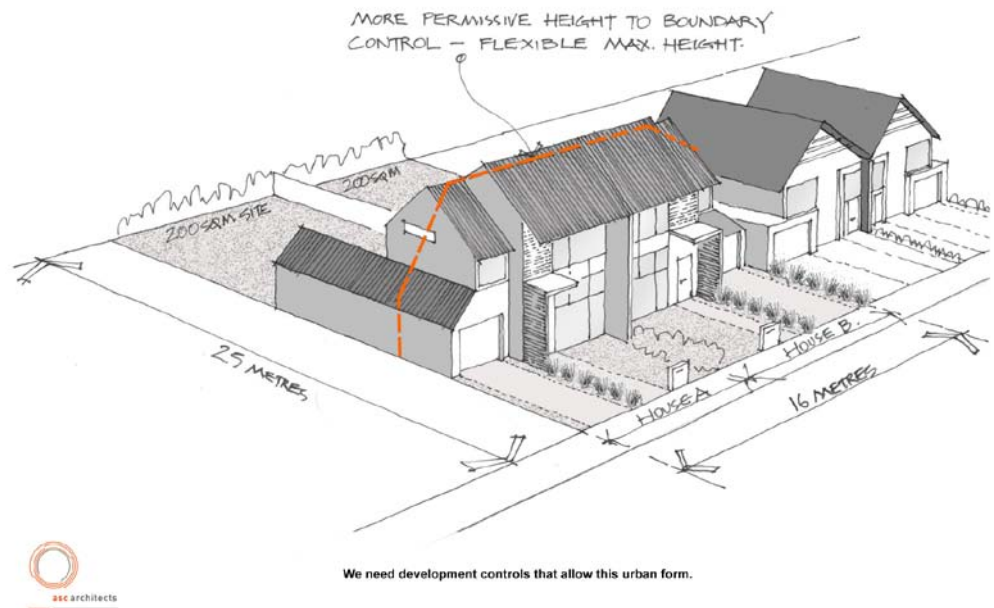


Fig. 3



11. The minimum site size will need to reduce from 300m² to, say, 200m². This will be tied to a minimum frontage of, say, 7.5 meters per house to avoid the (single) garage door dominating the frontage. The smaller sites will be more affordable.
12. The front yard will be the currently proposed minimum of 2.5 metres, but with a maximum of 5.0 metres (allowing a car to park in the drive) so as to enhance the streetscape and back yard advantages noted above. No height-to-boundary controls will apply along the street frontage.
13. The height in relation to boundary (HIRB) control will change to 3.0 metres + 45 degrees to all other sides of the site, with a wall on the side boundary permitted for only a 12 metres length (to allow for a double end-to-end garage). Other side walls should be set back from the side boundary by, say, 1.5 metres.
14. The maximum height will be able to be penetrated by the upper portion of a roof, sloping at more than 15 degrees, by up to a metre. Gable ends will be able to penetrate the height in relation to boundary control up to a metre vertically, and up to 3 metres horizontally. (Note that the diagram of this rule in the draft plan does not make sense, as the roof slope depicted is more than 60 degrees).
15. Subject to the above exemption, the maximum height could be set at 8 metres generally for the zone, but 10 metres for the terrace house type under certain conditions – a site bigger than 600 or 800m² for example, with the higher limit applying only in the centre portion of the site. In a row of three or four or more terrace houses, the centre one(s) could then be three storeyed, leaving a lower interface at the ends of the row to the sites next door.
16. The height in relation to boundary control and the maximum height control should both be changed as above, for any house type in the Mixed Housing zone.
17. We submit that the HIRB rule is an impediment to achieving good urban form and density. For any project submitted for resource consent, including for sites less than 1200m², the HIRB rule should not apply because the Bulk and Location (outlook and solar access) rules suggested below will achieve superior outcomes.
18. There is confusion around how the minimum site size rule works when vehicle circulations are provided within the overall development site. For instance, an assumption based on the draft is that a 600m² site can be divided in half. But if it is a front lot/rear lot subdivision, and a vehicle access-way to the rear lot of, say, 3 metres x 20 metres (60m²) is provided down the side of the front lot, the definition of 'net site area' would suggest the proposal would not comply, as the total of the two new lots would only be 540m². We consider there is more work to do regarding this rule.

Bulk and Location Controls

19. We consider the draft rules for the space outside dwellings is confusing, and can be rationalized across both zones.
20. In the Mixed Housing zone, draft rules deal with privacy between windows (clause 4.3.1.4.1.6) and outdoor living space is covered by clause 4.3.1.4.3.6. In the Terrace House and Apartment zone there are three side yard dimensions (clause 4.3.1.4.4.2), outlook space provisions (clause 4.3.1.4.4.5) and outdoor living space requirements (clause 4.3.1.4.4.6).
21. Some of the diagrams in these clauses do not relate to the text, e.g., Figure 5 in clause 4.3.1.4.1.6 and Figure 6 in clause 4.3.1.4.4.5.

22. **We suggest** that all the controls mentioned above relating to outdoor space should be replaced with some simple rules based on Outlook Areas from the main windows of habitable rooms. For example:

An Outlook Area 4 metres wide x 8 metres (Primary Outlook Area) extending out from the main living room windows. This area to include a minimum 16m² Outdoor Living Area if the dwelling is at ground level, or a minimum 10m² balcony or roof garden if it is not at ground level, both with a minimum dimension of 2.4 metres.

An Outlook Area 3 metres wide x 4 metres (Secondary Outlook Area) extending out from the main windows of any other habitable room.

The Outlook Areas are contained on the site, or extend over public space, including streets. They may also be over adjoining private open space if this is secured on the title.

The Outlook Areas can overlap in respect of windows from the same dwelling, but not in respect of windows of a neighbouring dwelling.

23. Additional to the outlook areas, a rule on solar access is required.

We suggest the following:

Buildings should not significantly overshadow Primary Outlook Areas, including those on neighbouring properties. Buildings should be designed to allow Outdoor Living Areas and balconies to receive at least three hours of sunlight at the equinox (21 September) for 50% of their area, which shall be in the part of the Primary Outlook Area adjacent to the main living room windows.

This should be demonstrated by shadow diagrams that will take into account shading from buildings both on the site and on adjacent sites, but not from trees and soft landscaping. The calculation will also take into account solar access to neighbouring sites as they exist at the time.

24. This proposal will need further testing at higher apartment densities.
25. We do not consider that dwelling to dwelling privacy issues beyond those provided by the suggested Outlook Areas need to be addressed in the Plan. There are many solutions to window privacy (curtains, blinds, frosting, louvres, both internal and external, etc.,) and these should not be prescribed.
26. Below are four diagrams (**a, b, c, d**) of typical developments showing the Primary and Secondary Outlook Areas, and the possible range for north-points for each development to comply with the suggested solar access rule.
 - a: Two new terrace houses on a 400m² site
 - b: Existing house and rear infill house on a 600m² site.
 - c: Twelve apartments on a 800m² site.
 - d: Three new houses on a 900m² site.



diagrams c. and d.



4.3 Business Zones

General Comments

1. **We support** the general principle outlined in Section 3.2.3 that the business zones are intended to “reinforce the role of centres as focal points for business and community investment” and that the range of Permitted Activities (as outlined in Table 1 Section 4.3.3) has broadened and encourages the provision of urban centres that combine business and residential activities.

This objective **should not be undermined** by the granting of consent to applications for development such as Lunn Avenue and Stoddard Road that should otherwise contribute to investment and amenity in local urban centres.

2. **We note and support** the emphasis on creating a built environment that is comprised of a high quality public realm supported and defined by high quality of development. These quality ambitions are not supported in the text objectives and policies for the business zones, nor do the Development Controls in Section 4.3.3 provide assurance that quality will be achieved. We recommend that the high level goals in the RPS should be reflected in the objectives and policies, and be supported by development controls that focus on good outcomes.

On this basis, **we do not support** the development of 3 storey buildings as a Permitted Activity in the Neighbourhood Zone. Development in this zone, like the Local Centre and Mixed Used zone, should require resource consent with assessment criteria written so as to encourage an appropriate design response to the given context.

3. **We support** the reduction in the number of Business Zones and generally support the definitions of the 10 zones as outlined in Section 3.2.3. That said, the logic that differentiates town centres into small, medium and large is not evident. A reduction in the number of smaller urban areas zones should be considered given the potential for a Mixed Use Zone to provide for a range of activities and to fulfill the objectives of the Local Centre and Neighbourhood Zones.
4. The maps illustrating the business zones are difficult to read because of the similarity of colours to differentiate some of the zones.

There needs to be a **more careful analysis** of the various urban centres and the suitability for the new zone classifications as there are a number of incongruous zone allocations. Some information about the overlays is missing from the maps and related explanatory notes and legends. For example, the overlays on height in Takapuna's Mixed Used areas are missing from the maps.

The format of the documents is unwieldy and confusing. It is unhelpful that information about Resource Consent requirements for new building ((3.2.3.3 – 10) and the activities allowable within new and existing development (4.3.3.1 Activity Tables and 4.3.3.2 Notification) are located in different parts of the document. The numbering system is also confusing.

5. Given the overall reduction in the number of rules, it would be useful to have a summary table of the rules with reference to full explanation and illustration following.

Specific Comments

6. We comment below on a number of development controls, but make the point that, overall, the development controls are generally not written in such a way as to demand performance outcomes, but are a repetition of prescriptive and out-dated old rules, albeit fewer in number.

While noting the desire and need to provide certainty for land owners and developers, **we suggest** that the Business Zones are not under particular pressure at the moment and **suggest** that time be allocated to develop better controls that will allow and encourage good development.

7. Section 4.3.3 (Part 4 Rules, 4.3 Zone Rules)
Drive-through facilities **should be** a Restricted Discretionary Activity in Mixed Use and General Business Zones.
8. Building Form Development Controls: Height, Height in relation to Boundary, Setbacks, Minimum Tower Dimension

In general **we support** the increase in height and the simplified Table Form (4.1.1. Table 1). However, **we have concerns** about the additional arbitrary controls that also contribute to building form and which run the risk of poor building outcomes where development is driven by rule conformance, rather than as a result of achieving quality outcomes driven by performance criteria.

9. 4.1.2 Height-in-relation-boundary: The series of diagrams demonstrating this control suggests that a building will be less dominant with a stepped profile, rather than the use of a given setback, a vertical or single stepped elevation and with a landscaped buffer zone over a portion of a site's rear boundary. A different rule could result in a better relationship to adjacent smaller buildings. The reduction in allowable height of buildings adjacent to Public Open Space in a number of zones is tentative and does not make sense.
10. The creation of a positive relationship between a development on a site adjacent to public open space should be the objective of controls in these areas. Built edges should address or respond to the public open space so as to provide opportunities for

passive surveillance as well as an attractive boundary edge.

The nature of the diagrams suggests that stepped building envelopes that are extruded along a boundary edge are permissible under the control. However, there is plenty of evidence in the past of the literal interpretation of such rules resulting in poor quality architecture. It also encourages a building form that is costly to construct given the inherent weathertightness issues to be addressed.

11. A number of variables will determine the best solution for any given site, in particular its size (especially depth and geometry) and the local topography. It is preferable to develop a rule that addresses solar access and dominance in relation to adjacent buildings with a control that can allow flexibility due to these variables.
12. 4.1.3 Building Setback at Upper Floors and 4.1.12 Building Frontage Height
The intention of this control is clear – to create a defined street space with a sense of enclosure in the streets, while ensuring that the streets maintain a frontage height that is not out of scale with the street it fronts. **We support this.**

This intention should be reinforced by the requirement for a building activity behind the façade that contributes positively to the street environment that the building fronts onto.

Related to this is the lack of clarity about the requirement for a minimum podium level at the base of towers.

13. **We note** the inclusion of towers in both the Height tables and setback rule. **We suggest** that large towers require specific consideration and a response that works in the near and far contexts, and that inclusion of the same, albeit scaled setback control will not necessarily result in the best outcome.

We note that Figure 6 in Section 4.4.5 Outlook Residential Zones will also apply to development in Business Zones where residential activity is provided on upper floors. While noting the need to provide light and solar access to apartments, we have reservations about the resultant stepped building forms and recommend consideration of the outlook courts defined in Annexure 12 of the *Victoria Quarter Plan Urban Design Strategy and Building Typology Diagrams Auckland City District Plan*.

14. 4.1.4 Maximum Tower Dimensions and Tower Separation
We suggest that tower design needs to be considered as a particular building type on its own rather than simply as a taller condition within the table of permissible heights and attendant setbacks.

The rules should be performance based to demand an elegant building form that ensures sun penetration to the adjacent streetscape, and which is wind tunnel tested to mitigate issues of downdraft and impact on the pedestrian realm.

Any rule needs to take cognizance of the requirement for large floor plates that suit corporate business requirements, examples of which have been built recently in Auckland – city and business parks which are considered quality business real estate.

15. Frontage Controls:
4.1.5 Buildings Fronting the Street
We support the application of the Key Retail Frontage Areas overlay and suggest that some frontage controls or consideration of a design response to site frontages is demonstrated as part of Mixed Use Zone development.

We note the requirement for development to adjoin the site frontage as specified in 4.1.5.4, but propose that the percentage is related to the actual width of the frontage in the event of very wide sites that may result in gaps in the local urban fabric.

16. 4.1.7 Minimum Floor to Floor, Floor to Ceiling Heights
We support this rule as both encouraging quality interior space as well flexibility for developers in the overall permissible height (Table 4.1.1).

17. 4.1.13 Yards
We support the removal of yards and setbacks within the Business Zones and generally support the yard requirements outline in this rule, while noting our comments on this issue in connection with height in relation to boundary controls discussed above.

City Centre Zone (4.3.4)

18. The planning Maps now no longer make the distinction between the central area and the Isthmus as the Operative Plan does and this perhaps breaks down the unnecessary distinction between the central area and the balance of the city.

The activities largely remain the same except:

19. 3.3.4.1 Activity Table

We believe that the demolition of any building should only be undertaken, and consent granted accordingly, if consent to demolish forms part of a consent to rebuild another building on the same site.

4. Development controls

20. 4.1 Building Height

Building heights **should be controlled** in terms of both maximum and minimum heights. It is suggested that in order to generate a sense of intensity in the inner city that minimum building heights be included as well as maximums.

21. 4.3 Harbour edge height control plane

Add to the section 'Purpose': "reinforce the Quay Street east west connection running from the corner of Gladstone Rd and Quay Street to the east and Jellicoe Street to the West by the alignment of building frontages and height".

21. Figure 2 which defines the Harbour edge height control coordinates **should be extended** to include the larger harbour edge height control suggested above.

22. 4.5 Dilworth Terraces view protection plane

The diagram as shown would prevent the construction of higher building towards the eastern end of the proposed extended harbour edge height control plane as suggested in 4.3 above.

23. 4.7 Rooftops

We support the concept of rooftop controls.

We suggest 4.7.1 be simplified by the rewording of the second part of the paragraph as follows: "...must be enclosed and integrated with the overall roof design."

24. 4.8 Minimum floor to floor/ceiling height

We believe the objective that "buildings are adaptable to a wide variety of uses over time" is incompatible with rules 2 and 3 as the proposed control of a 2.7 metre ceiling height will not allow a residential building to be adapted for office use in the longer term as the 2.7metre residential ceiling height could be achieved using a 3.0 metre floor-to-floor height, and a building with a 3 metre floor-to-floor height is not suitable for conversion to a quality office building.

25. Rule 4.8.2 is redundant as it is highly unlikely that an office building in the City Centre would be occupied with less than a 3.6 metre floor-to-floor height.

26. 4.9 Ground floor at street frontage level

Qualified support. It is uncertain as to the outcomes this rule would deliver. It is not necessary that the entry to a building be at street level. In any case entries above the street offer greater drama to the street. The depth of habitable space at the street may prove impractical. We do not support this rule in its current (untested) form.

27. 4.10 Building frontage and alignment

The frontage height supposes a network of primary and secondary streets which are defined by the height controls and this is commendable.

The frontage heights proposed are too low in areas and will not achieve "streets ... well defined by buildings and a sense of enclosure to enhance pedestrian amenity." For example, taking into account 4.8 metres above a 13 metre minimum frontage will yield only a 3 storey commercial or residential building. This is considered too low, particularly along major routes such as Quay, Fanshawe, and Symonds Streets, Mayoral Drive, and Karangahape Road.

28. 4.11 Maximum Tower dimensions

The rule must be careful to encourage the "purposes" stated as well as "a sense of enclosure to enhance pedestrian amenity". The rule will help mitigate wind effects, but further elements, e.g., verandas, may also be required. The rule may conflict with Rule 4.26, however, and requires rationalization.

The modern office environment often requires floor plates in excess of the proposed 50 metre maximum plan dimension. Large businesses require large floor plates which are considered as being conducive to team work and collegiality – both are accepted prerequisites for workplace productivity and creativity. Productivity and creativity are goals of the Auckland plan.

There may also be areas where alignment of towers with the street edge for the full height of the building is desirable. Examples of this occur in parts of lower Hobson Street where quite high buildings form a dramatic street edge that frames views to the water.

The control of the height of the building where the setback from the street edge occurs is set apparently arbitrarily at 28 metres. We suggest that this should be determined perhaps by the street width onto which the building fronts, at say a ratio of 1.5:1 where 1= street width. Where appropriate frontage height could be set in context with adjacent buildings where a sequence of similar scaled buildings exists, e.g., Customs Street East.

29. 4.15 Verandas

It is further **recommended** that verandas be required to lap onto or overlap adjoining verandas so that continuous pedestrian cover is achieved.

It is **recommended** that air space leases from Auckland Transport should not be required at these normally attract cost and the owner should not be having to provide the veranda for public use with any additional cost. Support otherwise.

30. 4.16 Wind

It is noted that the rule regarding wind effects does not apply to the Port Precinct, however this rule should be applied where any structure constructed within the precinct and abutting or near public space is required to mitigate the wind effects. Support otherwise.

31. 4.17 the rules are the same as the ODP.

Support.

32. 4.18 Special amenity yards

The yard at the corner of Queen and Quay Streets prevents the completion of the Queen Street street form and will not achieve "streets ... well defined by buildings and a sense of enclosure to enhance pedestrian amenity." It is recommended that the rule not be applied in this instance. **Support** otherwise.

33. 4.19 Outlook space

Figure 12 shows building separation between sites. This should be amended to show the building constructed to the boundary perpendicular to the road frontage boundary. Buildings set back from the side boundaries as shown will not and will not achieve "streets ... well defined by buildings and a sense of enclosure to enhance pedestrian amenity."

Figure 13 shows a graduated façade setback. The diagram should be simplified to show a maximum separation of 15 metres. The further setback on Figure 13 at 50 metres is undefined and should be deleted. Tall buildings tend to enjoy oblique views from the site and so further setbacks are not required.

It is unrealistic to expect outlook space to be secured over a neighbouring property as adjacent land owners are unlikely to agree to this. Rules d,e,f, and g should be deleted accordingly.

Note that the rule may lead to unintended consequences such as that brought about by the height control established via a covenant over the site seaward of the Scene Apartments (now occupied by the Britomart carpark) which has destroyed the intended gradation of building height from the Britomart Precinct to the Vector Arena.

34. 4.20

The Unitary plan proposes a minimum dwelling area of 30m² which is a reversal of the previous rules which a gradation of sizes depending on bedroom numbers which was too prescriptive.

However, the proposed rule may encourage a large increase in smaller apartments which would skew the demographic of City Centre Zone dwellers towards single or small groups (couples) thereby reducing the diversity of the City Centre community.

While we believe that a good level of amenity can be achieved in a 30m² dwelling by good design we believe that minima need to be set for apartments other than studios or one bedroom apartments. For example, it would be possible to create a four bedroom 60m² apartment under the proposed rules, but the level of amenity provided in living and kitchen areas would be unsatisfactory. We recommend that the rule be "the area of living spaces (combined kitchen, dining, living) be no less than the combined area of the bedrooms and bathroom(s) provided in that dwelling."

We believe that this rule would allow more flexibility of design while maintaining a good level of amenity in the dwelling.

35. 4.21 Daylight to dwellings

We support the requirement for bedrooms to have external glazing, while noting that there needs to be some flexibility for mezzanine/studio type apartments and also for residential adaptive reuse where borrowed light may be an appropriate and suitable solution, and of course there should be a requirement to address ventilation in such circumstances.

We support the intent to ensure that quality living spaces are created in multi-unit dwellings.

36. 4.22 Minimum dimensions of principal living rooms and principal bedrooms

Support.

37 4.23 Servicing and waste

Do not support.

The rule is prescriptive and does not account for managed waste solutions. The current process where a waste management plan is required to accompany a consent should remain.

38. 4.24 Basic Floor Area Ratio

1. **Do not support.** The FAR allowable has barely increased from the current Operative Plan. The City Centre is an obvious place to greatly increase FAR which will allow greater development of the CBD. This will encourage more businesses to occupy the city centre and aggregation benefits to business. The increase in FAR will also allow larger residential developments to be undertaken which may help provide housing to the market.

An increase in building height and scale is appropriate to the City Centre where tall buildings already exist and increasing this will add to the drama and excitement of the city centre experience.

It is acknowledged that tall buildings often exist adjacent smaller or perhaps heritage scales ones and this disjunction is of concern. It is noted, however, that there are successful design strategies that can overcome these scale disjunctions.

2. **Support.**

3. **Support.**

39. 4.25 Bonus Floor Area Ratio

Support generally.

It is noted that a goal of the Plan and Mayor Len Brown is to achieve a beautiful city, and design quality is emphasized. This goal is not, however, incentivized. To achieve design quality a bonus should be provided for buildings which are identified as being of 'Exemplary Design Quality'. The suggested process is that the required exemplary design would be identified by the independent experts on the Auckland City Urban Design Panel in a presentation or presentations to that Panel. The bonus awarded should be an additional 25% of FAR.

40. 4.26 Bonus floor area ratio-light and outlook.

Do not support.

It is agreed that light penetration to the city is generally desirable. The rule may conflict with Rule 4.11, however, and thus requires rationalization.

The bonus only works for large sites and not for small ones where the slenderness required to achieve the most advantageous ratio results in floor plates too small to be feasible.

We support a modified rule otherwise.

41. 4.27 Bonus floor area – dwellings

Can **neither support or otherwise**: the clauses noted for dwelling sizes, dwelling mix, or daylight control cannot be found at this time.

42. 4.28, 29, 30, 31 historic, heritage and historic character buildings

Do not support. The rule presupposes that these buildings cannot be used in any way other than in their current form. This is contrary to the stated goal of innovation. We note by example the Imperial Buildings development, a recent NZIA New Zealand Award winner, which includes significant remodelling of a character building.

43. 4.32 Bonus floor area – publicly accessible open space

Support generally.

Rule 3 should be deleted as this feature should be strongly incentive to provide a diversity of publically accessible spaces within the city.

44. 4.33 Bonus floor area – through site link (all types)

Support generally, subject to:

1. Through site links offer the opportunity for the city to create a diversity of spatial experiences. They must, however, be located, and the bonus applied accordingly, only in positions which can demonstrate linkages to existing public spaces which will integrate with the existing street network to provide an enhanced pedestrian experience. This partly addressed in 4.34.
2. Through site links of all types must have active frontages to enhance the pedestrian experience and safety. To qualify for the bonus through site links should have at least 50% of their frontage lined with active occupation, e.g., retail or lobbies.

4.34

See 4.33 above

4.35

Support.

45. 4.36 Maximum total floor area (FAR)

Qualified support.

See comments on 4.26 above

46. 4.37 Building in relation to boundary

Do not support.

The rules and methods for determining building bulk result in building form that is of an awkward geometry that does not define space. It is noted that other rules which as the separation at boundaries will serve to break building form down and allow landscape character to dominate.

47. 4.38

Do not support.

The rules particularly for those sites shown in dark grey will continue to generate buildings that do not address the street properly and will not deliver streets where “a sense of enclosure to enhance pedestrian amenity” is achieved, nor will security be enhanced.

It is noted that many of the sites shown have rear boundaries to open space and it is recommended that the rule apply only to these open space frontages.

48. 4.39

Qualified support. We have addressed this matter in another part of our submission.

4.40 Dwelling mix

Qualified support. We are concerned that the proposed maximum of 70% of studio or one bedroom apartments in any development will skew the city demographic and restrict the diversity of city centre dwellers.

49. 4.41

Qualified support.

Balconies contribute to the texture of a building’s façade, and deliver contact with the natural environment which is critical to Auckland’s character. We recommend there that the provision of balconies should be incentivized and should not be included in FAR calculations whether these are recessed within the building façade or projecting.

Rule 2 (balcony, roof terrace) may be impractical for the southern and cold sides of buildings.

50. 5.0 Assessment

Qualified support.

The assessment criteria are generally good but should be included as a guideline to allow for creative solutions to be developed.

We recommend that an alternative approach to achieving a design assessment is by the utilization of the Urban Design Panel and design aspects of consents could be assessed and approved directly by this process. This would speed the consenting process and contribute to the published Unitary Plan target of increased productivity in Auckland.

Business Zones Assessment Criteria

51. Assessment Criteria could provide a very effective means of design assessment but those in the current draft document are not well written and unclear. The overall intention to provide assessment criteria that should lead to a quality urban environment is understood, but we do not have confidence in the content which includes some very arbitrary calls, e.g.,

*“buildings should be designed to differentiate ground, middle and upper levels” (5.1.2.6c);
“where the proposed building or development is an extension to or alteration to an existing building, it should be designed with consideration to the architecture of the original building” (5.1.2.6h).*

Such criteria risk suggesting an assumption that the quality of the original building is worth responding to.

*“... Walkways/breezeways should generally be avoided” (5.1.2.6.o.iii) and
“Common areas... Minimizing stairs where possible” (5.1.2.9.d)*

52. While noting that there are recent examples of poor quality access along breezeways, this form of access, while having economic advantages could be developed into a positive attribute if such spaces were encouraged to be of a dimension to make them social spaces. Similarly related to the issue of development economics and housing affordability, the development of walk-up apartments to 3–4 storeys should be encouraged.
53. We note the call for a Design Statement. Again, while we recognize the intention for designers to provide a comprehensive design process, there is a risk that this could become a box-ticking exercise. While it may be useful to have a list of issues that need consideration, much of what is listed might well be provided in a comprehensive drawing set. That said, we note that it can be helpful for all those involved in development to be aware of the need to a broad range of address.
54. In respect of the Assessment Criteria in City Centre, we note our **qualified support**. The assessment criteria are generally good as they act as a guideline to allow for creative solutions to be developed.

We recommend that an alternative approach to achieving a design assessment is by the utilization of the Urban Design Panel and design aspects of consents could be assessed and approved directly by this process. This would speed the consenting process and contribute to the published Unitary Plan target of increased productivity in Auckland.

For more on the importance of Assessment Criteria and their relevance over a rules bases approach, we refer you to the submission by Professor John Hunt, and **we support** his point of the importance of appropriately qualified staff to assess design issues including Design Statements.

Further matters

55. Development contributions
As bonus features listed above are critical in the creation of Auckland City’s objective of the ‘World’s Most Liveable City’, Development Contributions applicable to the area to which the bonus applies should not be payable.
56. Façade projections
The good design of buildings fronting the public street requires the articulation of facades. Façade projections of not more than 0.5 metres from the site boundary onto the street and no less than 2 metres above the footpath should be a Permitted Activity. These must not accommodate floor space.

No air space lease will be payable for such projections to Auckland Transport, and permission is not required from Auckland Transport.

4.4 Transport

Part 2 Regional Policy Statement

1. **We strongly support** the philosophy of Transport Planning being fully integrated with Land-use Planning within the “quality compact city” model adopted by the draft Unitary Plan.
2. **We strongly support** this ‘spatial’ integration to optimize living, business and other uses within and connected to the transport and movement space throughout all the area of the Unitary and Auckland Plans.

We consider that this integration is necessary to enable the high quality transport spaces and access to transport required for the high quality ‘livable’ intensification required by the Unitary Plan.

[Refer to diagram – *Recommended shift from arterials to workable arterials / multi-way boulevards*, page 27]

Part 3 Regional and district objectives and policies

3. **We support** the Regional and district objectives of 3.1.1.1 Network utilities, energy and transport Objectives (3.1 Auckland-wide objectives and policies, 3.1.1 Infrastructure)

Objectives:

1. Safe, efficient and secure development, operation and upgrading of (Transport) infrastructure is enabled, to service the needs of existing and planned development, while managing adverse effects.
2. Resilient infrastructure and a continuous supply of service is provided.
3. The amenity of urban areas is maintained and enhanced by managing the adverse visual effects of above ground infrastructure and electricity generation facilities.
4. **We strongly recommend** that policies, rules and assessment procedures go further than allowing use and managing “adverse effect”, and incentivize infrastructure planning and proposals that :
 - a) fully consider the infrastructure space and context alongside the end use
 - b) optimize opportunities for productive synergies between uses, urban liveability and environmental quality
 - c) demonstrate ability of proposed infrastructure upgrade to adapt efficiently and effectively to enable potential future growth, intensities and changes in use.
 - d) give preference to the implementation of transport routes offering transport choice as a critical factor in quality development and intensification. Investment in walking and cycling infrastructure alongside public transport is vital to reduce future car dependency and optimize the benefits of active transport choices.
5. **We support** Regional and district Provision of infrastructure, Policies (1 – 11) 3.1.1.1 Network utilities, energy and transport (3.1 Auckland-wide objectives and policies, 3.1.1 Infrastructure)
6. **We strongly recommend** that the policies 5,7,9,10 & 11 specifically addressing Transport space and structure (as below):
 5. *Encourage new infrastructure to be located in roads and other identified corridors.*
 7. *Enable the coordinated undergrounding of existing electricity and telecommunications lines in the road reserve, particularly where the opportunity exists with the road network improvements.*
 9. *Provide for the construction, use, operation, maintenance and development of the road network in a manner which:*
 - a. *contributes to the operation of the single integrated multi-modal transport system*
 - b. *provides for the transport movement and accessibility functions of the road*
 - c. *provides for the placemaking functions of the road*
 - d. *provides for transport infrastructure, streetscape amenities, and network utility services within the road.*
 10. *Provide access to the road network which is safe and efficient and minimizes conflict between the placemaking, movement and access functions of roads.*
 11. *Undertake or require works to be undertaken in an existing or planned road, which is or will be vested in council, in a manner which will achieve positive movement, access and placemaking*

outcomes taking into account:

- a. *the functions, priorities and operational characteristics indicated by whether the road is identified as an arterial road*
- b. *the characteristics of the location e.g., ensuring high priority to pedestrian amenity in centres*
- c. *the place/context design typology which is appropriate to the design of a road in the particular location.*
- d. *any historic heritage or special character context*
- e. *the selection, location and installation of streetscape amenities, such as seating, cycle parking, plaques and memorials, public art, litter bins, public toilets and drinking fountains, to:*
- f. *design principles for streets, and the street design process as identified by the Auckland Transport Code of Practice*

are augmented with additional policies and rules and assessment procedures that go further than allowing use and managing “adverse effect” and incentivize infrastructure planning and proposals that:

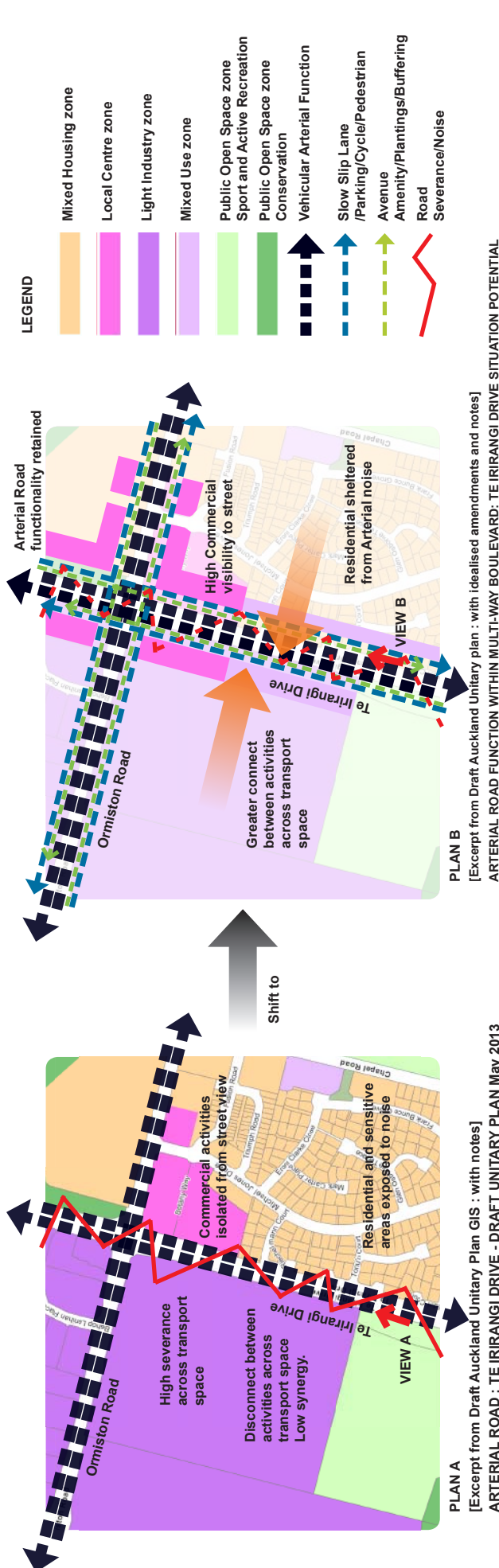
- a) *fully consider the ‘road’ network spaces as social and economic spaces (as ‘Streets’ where appropriate) concurrently as being the movement/service infrastructure space ‘of the single integrated multi-modal transport system’*
- b) *optimize opportunities for productive synergies between uses, urban liveability and environmental quality (e.g. enables and promotes avenue tree plantings)*
- c) *demonstrate the ability of proposed integrated multi-nodal transport system to adapt efficiently and effectively to enable potential future growth, intensities and changes in use.*
- d) *give pedestrians and cyclists priority in Urban Areas*
- e) *give vehicles that are not propelled by fossil fuels privileged treatment in urban areas, including cheap or free parking.*

Part 4 Rules

7. **We recommend** that in all Business Zones including in the City Centre, sole-use car-parking buildings should be classified as a non-complying activity.
8. **We support** the provision of Verandahs in Business Zones and in the City Centre Zone. We suggest the following modification to City Centre zone rule 4.15.5.d: ‘opaque’ should be changed to ‘translucent’.
10. **We recommend** that, in general, all development controls that contain a clause related to “Building design and interface with the public realm” should contain a requirement to provide cycle parking facilities and end-of-trip facilities to encourage the growth of active transport.

Maps

11. **We recommend** that the Infrastructure overlay within the Unitary Plan Maps be extended to comprehensively show the network of current and future walkways and cycleways.
12. **We request** that consideration be given to the creation of an overlay to show ‘connection precincts’ in which the transport and movement spaces are to be reformatted to integrate with adjacent zoning of more intensive social and economic activities.



Platform Two: Enhancing Auckland's Unique Character

5.1 Natural Environment – Features, Landscapes and Character Areas

We endorse the over-riding aspiration in the Unitary Plan to ensure that Auckland retains and enhances its own unique features both natural and man-made.

Part 2 Regional Policy Statement

2.1.3 Protecting our historic heritage, historic character and natural heritage.

1. There is pressure to accommodate increasing levels of subdivision, use, and development. The cumulative effects these activities have on the naturalness, quality and values of outstanding natural features and landscapes need to be considered.

Outstanding Natural Features Policy 2.4.3.1 and 2.4.3.2 Objectives:

1. *Auckland's areas of high and outstanding natural character in the coastal environment are protected from inappropriate subdivision, use and development.*
2. *Promote, where achievable, the restoration and enhancement of areas of high and outstanding natural character in the coastal environment, including in the Waitakere Ranges Heritage Area and the Hauraki Gulf/To Moana Nui o Tei/Tāpapa Moana.*

We generally support.

2. However, the natural landforms of volcanic cones, maunga, Waitakere Ranges and Hauraki Islands have been identified and the primacy of the coastal edge recognized but nowhere within the Outstanding Natural Landscapes are the actual harbours, Waitemata and Manukau, identified as being significant. While appreciating that any changes made to the harbours are subject to RMA Resource Consents, we seek an overlying protection zone restricting land-fill into the harbours.

We seek the words “Waitemata Harbour and Manukau Harbour” be added to point 2 Objectives.

3. Objective 7. Recognize the role of existing rural production
We support, especially in the Unitary Plan's strategic aim to not squander valuable agricultural land for housing development.

Rules, Natural heritage 4.4.6.3 Volcanic View Shafts and Height Sensitive Areas

4. **We note** the change in status of proposed building height penetrating the floor of the volcanic view shaft in height sensitive areas up the height limit of the underlying zone height as being a Restricted Discretionary Activity. Specific areas where there is a conflict with Council's aspirations for development as identified in the Draft Unitary Plan's zone heights and the protection of views to significant volcanic features through the view shaft overlay would allow development of significant height (in the case of Newmarket up to 72 metres) as a Restricted Discretionary Activity. Other Areas where a conflict seems to be apparent are Mt Albert and Panmure.

We support the Auckland Council Regional Policy Statement, Change 8 – Volcanic Features & View Shafts, Operative 21 March 2012, as a sustainable pathway for development that protects views to Auckland's unique and culturally precious landscape features for future generations of Aucklanders,

We seek the removal of the Restricted Discretionary Activity (and reversion to non-complying) classification for development height in height sensitive areas.

We note that the development of the Volcanic Protection View Shafts originally served a dual purpose of protecting significant views to the volcanic cones AND making clear areas where tall development could take place without compromising Auckland's Outstanding Natural Features. This is now increasingly made important to sustain intensification.

Trees

5. Auckland Plan Strategic Directions 7, 8, 9 and 12 in relation to the Natural Environment / Natural Heritage: Policy: 2.4.3.3 Trees and Vegetation
Rules: 4.4.6.4 Tree Protection

We support. However, with the removal of tree protection from the RMA, the quality of our suburban landscape as a leafy green environment, the “lungs” of our city, is under distinct and immediate threat from proposed intensification. We believe it is imperative for the preservation of existing character trees that:

- a. the tree protection existing under other Councils is re-instated /re-inforced
- b. high priority is given to updating the Protected Tree Schedule Appendix 3.4
- c. The importance of street trees in the public realm is recognized as a valuable asset to quality of place and an urban street planting plan is developed in the overall Unitary Plan.

3.2.2 Public Open Space Civic and Community

6. 3.2.2.2 Informal Recreation zone Zones Policies and Objectives

We support. However, consistent with the proposed Unitary Plan’s aim for increased intensification of residential areas and smaller sections, an onus is placed on the Council to allow for additional open green spaces, both big and small. To date we have not seen any strategic planning in this regard.

Character Areas

7. **We support** the emphasis on reinforcing the underlying “village” structures of Auckland’s urban form by encouraging urban growth and intensification around these nodes.

Visual connections Appendices 7.1 Sight Lines

8. With increasing development critical views that reinforce Auckland city’s marine character are vulnerable to being built out. Within the CBD, these views are principally down the north-south roads. The city has already lost a key view of the harbour from Princes Street, which is now blocked by the Scene Apartments. The view from Symonds Street is compromised by the Vector Arena. We wish to see more view shafts added to the Controls, namely:
 - a. View of connection to harbour and water view from the O’Connell and Shortland Streets intersection. Propose a 20 metre high view shaft from intersection as part of precinct plan for this area. While this cuts across the old Star site, a design incorporating a high open glazed lobby will add value to all stakeholders and could be offset with other development bonuses. (see figure 1)
 - b. View east along the Quay Street axis to Wynyard Quarter, currently obstructed by the information pavilion. (see figure 2)
 - c. Views to the outer harbour from the end of Queens Wharf. If Queens Wharf is to be seen as the arriving point, the doorstep of the city, then this view is pivotal. (see figure 3)
 - d. Views of Rangitoto and the harbour from the Newmarket Viaduct south-bound lane.

Precinct Plans Appendix 11

9. Over the years much community involvement has gone into developing detailed precinct plans for neighbourhoods and areas. The Auckland Plan also leant heavily on this work. The current Draft Unitary Plan Appendix 11 – Precinct Plans is very patchy and random in what it deals with. It does not reflect this previous work and understanding of individual communities and infrastructure. The sections on Precincts should be the heart of the Unitary Plan and underpin the emphasis on communities and character and quality public realm that is required in the Unitary Plan. This work, undertaken with community and stakeholder involvement, would do a lot to allay fears of change in some areas.

We support the need for Precinct Plans and **we seek** more work in this area.

Fig. 1 View from O'Connell St / Shortland St intersection towards harbour

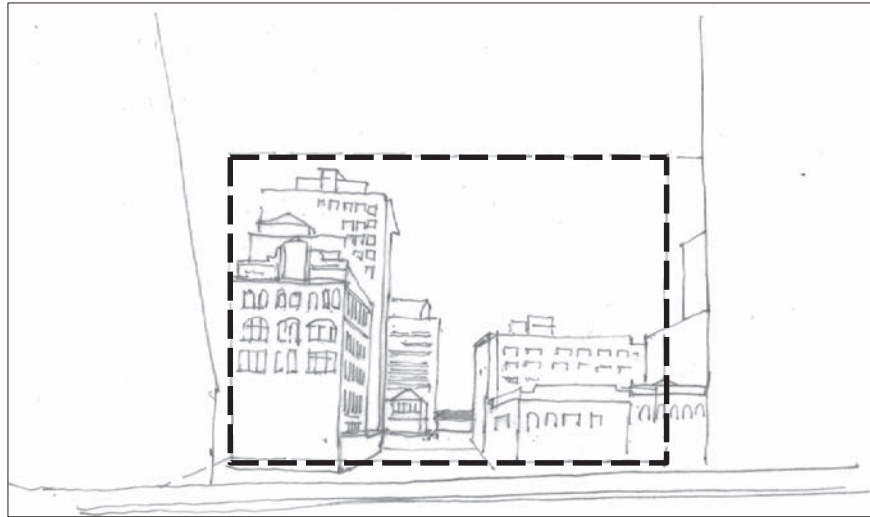


Fig. 2 View along Quay St axis West

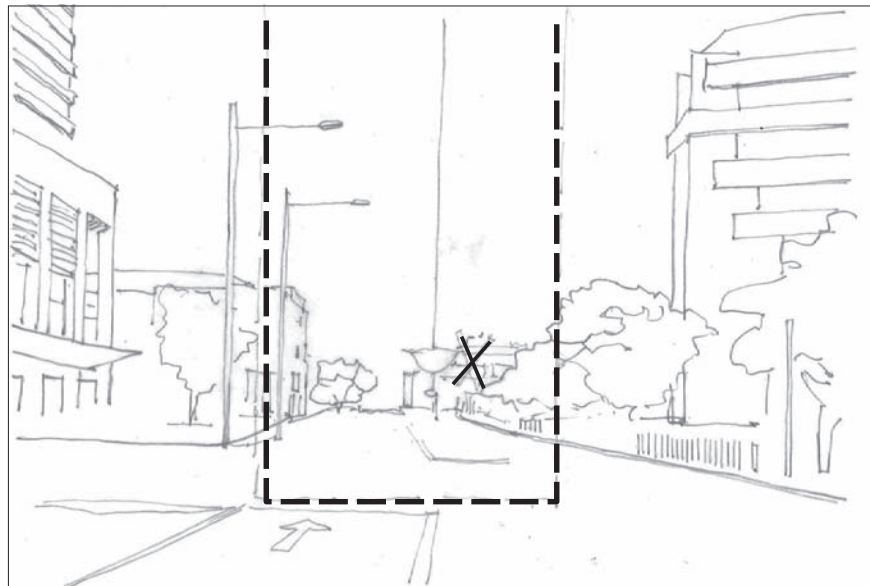
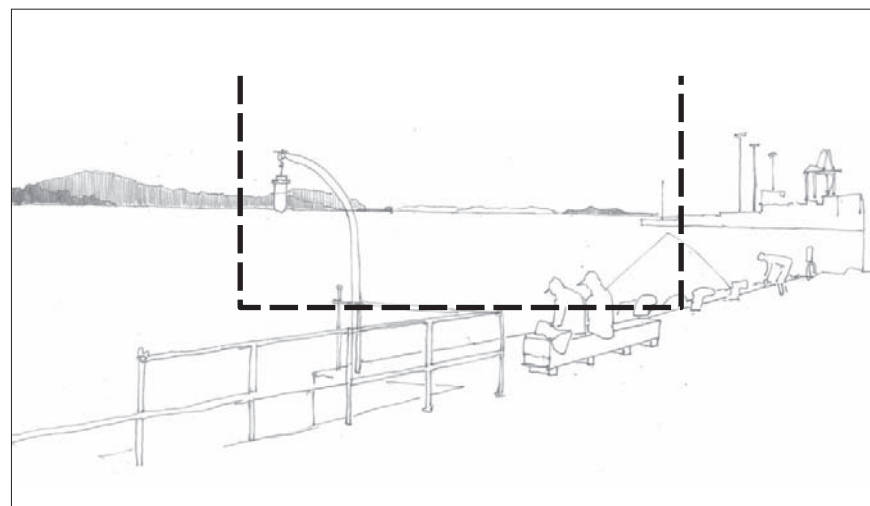


Fig. 3 Queens Wharf East to Harbour entrance



5.2 Heritage Areas

We endorse the aspiration as stated in section 2.1.3 that our historic heritage places require protection and conservation for present and future generations. **We recognize** that the identification of 'heritage' grows and changes over time – this poses particular challenges for the Unitary Plan in monitoring and controlling land use in the adjacency of 'heritage' places.

1. The Unitary Plan relies on a reduced number of "zones" covering large parts of the region. Every site is subject to a "zone" which enables a range of activities. All zones are governed by a suite of standard development controls and these are further regulated by a set of "overlays" which bring further rules. As such, each overlay introduces an added layer of complexity and process. Of note not all the overlay maps are directly relevant to your particular interest in the Unitary Plan and your interests in your property. Clearly there is a tension between provisions for growth and intensification and the regard and protection of unique qualities that lend Auckland's heritage its value.

It is not clear what provisions exist where heritage in one zone abuts another zone, particularly non-residential.

2. The "Residential - Terrace Housing and Apartment Buildings" zone encourages residential intensification. As such, it provides for buildings up to 14.5m in height and with no constraint with respect to density. As indicated in the Residential - Single House zone the Residential - Terrace Housing and Apartment Buildings zone does not anticipate commercial activity within the zone.

The height limit and density provisions do not appear to provide reference or control where development and intensification occurs next to recognized heritage.

There does, however, appear to be some provision for mitigating affects between zones e.g. business and residential. This is not directly related to matters of heritage per se, but rather to recognition of the lesser scale of neighbourhood centres. The height limits given in the draft Unitary Plan for development within the business – neighbourhood centre zone is given as 12.5 metres or three storeys as a maximum. This compares to the 16.5 metres or four storey maximums allowed for the Business – Local Centre zone.

We seek a rule requiring all development adjacent to a heritage building or area to be a restricted discretionary activity

3. The "historic heritage" overlay identifies places of significant "historic heritage" value. The use of the term "historic heritage" is linked to its use and meaning as found in the Resource Management Act. There is a concern that the qualifier "historic" implies some requirement for older vintage as an essential criterion for recognizing heritage. This is not necessarily the case.

The implication is the disregard for our modern heritage.

This aspect is further exacerbated by the application of the proposed pre-1944 blanket rule for all zones not otherwise governed by historic heritage or historic character overlay controls. While it is inappropriate to regard all pre-1944 buildings as having inherent quality, it is equally inappropriate to assume that no post-1944 buildings are without quality. The Environment Court is currently working its way towards a decision concerning the appeals brought against the Plan Modification 163 Residential 1 and 2 pre-1940 controls. Auckland Council has indicated that it will abide by the Environment Court's decision, but should the Court decide in favour of the appellants case then this could unravel the pre-1944 controls proposed in the draft Unitary Plan.

4. The "historic heritage" overlay also seeks to retain and manage identified historic character values of specific residential and business areas. Each historic heritage place has been assigned a category with associated controls on protection, development, demolition and use. Controls of places subject to the overlay may differ from the underlying zone, but quite how is yet to be discovered. Controls have been placed on use, development and demolition of buildings to manage change in these areas, but:

It is not clear what controls are provided for otherwise compliant development adjacent to sites governed by the historic heritage or the historic character overlays where such development may have an adverse effect on that heritage. The level of protection varies according to the intent of the overlay and may be more restrictive than the underlying zone.

5. The historic character overlay seeks to retain and manage identified historic character values of specific residential and business areas. The associated overarching objectives and policies present a constraining and directive approach to matters of development and design.

A conflict emerges from the unclear approach to such zones abutting the more intensive business zones as is evident in the tension arising between historic heritage or historic character sites and adjacent business zones objectives and policies.

Policies for this overlay target the protection and use of all historic character areas and require all development and redevelopment to have regard for and respond to the historic character and the historic context of the area. How is not clear, although these policies appear to seek to maintain the architectural values of buildings predominant in the area and not detract from the continuity or coherence of the historic character, particularly streetscape or landscape qualities through alterations, additions and modifications to the built form.

This is further governed by policies which seek to protect and enhance the built form, design and architectural values of buildings by controlling new buildings, alterations, additions and modifications.

6. A further control is applied to historic character in the business zones and includes policies which require:
 - a. new buildings or additions to existing buildings, which abut or are adjacent to historic character defining or historic character supporting buildings to respond sympathetically to the historic context of the area by providing contemporary and high-quality design which respects and enhances the built form and streetscape of the area;
 - b. the height of development to be compatible and respect the historic character and
 - c. scale of development.

These are particularly relevant considerations in the context of zones which abut other activity zones with a heritage and/or historic character overlay such as the relationship between the Residential – Single House zone and the adjacent Business – Neighbourhood Centre zone.

7. **We believe** incentives rather than rules are the best and most appropriate method for everyone working together in the common interests of our heritage.

There are also a number of “new” tools with respect to historic character controls which really go further to the conflation of heritage and character such as character plans which can be used by Council in the same way conservation plans are used in heritage (real heritage, that is).

Such systems are not addressed in the Unitary Plan.

- 8 In summary, the draft Unitary Plan does not adequately address heritage issues. **We seek** more work in this area.

Platform Three: Fostering Creativity and Quality

As density increases the quality of design outcomes in the urban environment becomes more critical to ensuring Auckland's continued amenity and quality of life. Quality urban design requires an approach that is flexible rather than prescriptive, and requires good communication between the developer/designer and the City planning authority. Like most things, the devil will be in the detail. We are yet to see the Auckland Design Manual and consider how it will improve quality outcomes, and if it will restrict creativity and innovation.

What has been completely undefined so far, is: how is this all going to operate in practice? Communities and professionals alike desperately want to buy in to the vision, but there is an innate skepticism about the time, cost and outcomes of the planning process – is it now going to get any better?

There is a total gap in communication here.

To fill this void **we recommend** that what we have called a 'Partnership Memorandum' should be drawn up as part of or alongside the Unitary Plan legislation. This document will clearly set down the way in which the Plan is to operate and what the expectations are of and from both developer/designer and the controlling authority. Its purpose would be to create clarity and certainty for Aucklanders, to enable the Unitary Plan to smoothly adjust to emerging circumstances over its intended life, and to promote the aims of the Auckland Plan for achieving quality and creativity in design. It would address the following issues:

6.1 Development and Review of the Unitary Plan

The Unitary Plan is undertaking a radical shift in shaping the city and in the approach taken to involving communities in this process. It would be excellent if a mechanism could be devised whereby key Local Area Plans and Precinct Plans are developed in parallel with the notification period of the Unitary Plan. This would enable more time to be given to getting the detail right at the outset of the 30-year life of the Plan.

It would also be of re-assurance to communities and create an atmosphere of certainty and purposefulness if a periodic review period (say five years) was incorporated into the legislation, whereby adjustments could be made in the light of such things as census results, availability of funding for infrastructure and transport projects, local and national financial performance and trends, operational experience of working with the Unitary Plan, etc, etc. It is appropriate that this review period would be more frequent than the ten year period required by the RMA, because of the extent of change anticipated.

In particular the review process needs to monitor the continued effectiveness or otherwise of the now outdated regime of development controls that has been carried over into this draft Unitary Plan.

We remain convinced that the city needs to shift away from heavy reliance on prescriptive development control rules towards a more performance based approach. Other cities succeeding with good quality intensification do so because they adopt approval processes largely based on discretionary evaluative processes. One day we believe that the planning culture within Auckland Council will need to accept this. We will continue to press for it and do not believe it need add any cost or time into the system.

The Partnership Memorandum would set out this whole process in easy to understand language that will engage the whole community in the adventure.

6.2 Procedures Manual

A model procedure for Council Consent process has been touched on in principle in the Auckland Plan, but should now be developed in more detail and set down so that both applicants and officers can share the same understanding.

If a clear process is identified, this will not only help to achieve 'Quality First', but also create more certainty and efficiency in the consenting process and help to keep costs of this process in check.

The principles of a good design process are set out in chapter 10 of the Auckland Plan: Identity, Diversity, Integration and efficiency. A model procedure might encompass:

1. Prepare Site and Neighbourhood analysis for all proposed developments
2. Prepare design response options for early consultation with Council staff
3. Either: Demonstrate through steps 1 and 2 that Resource Consent is not required,

Or: Lodge supported proposal for Resource Consent

4. Fast-track proposals that follow this process

In this way Council can incentivize good outcomes by making them cheap and easy, and discourage bad outcomes by making them expensive and difficult. We have expanded on this in sections 6.3 to 6.6 below.

6.3 Expert Peer Review

We recommend that the current practice of submitting major projects to the Urban Design Panel should be continued. We encourage Council to ensure the ongoing role of Urban Design Panels in the decision making process.

We recommend that this practice be extended for smaller projects, using a smaller Urban Design Panel (possibly two or three professionals). This could perhaps be administered at neighbourhood or local level (to enable community involvement), once precinct plans have been developed.

We recommend that the legislation should embody the principle that all projects could be subject to expert peer review, should either the Submitter or the Council request. It should be made possible that an independent urban design expert assessor could be appointed to peer review proposals to enable them to fast-track through the process. (In a similar way that at present structural design is peer reviewed for Building Consent applications). *Refer also to examples described under 6.5 below.*

6.4 Incentives for sustainable design

The draft plan calls for projects of a certain size and type to be “Green Star” compliant to a particular level. For instance, a building accommodating 5 or more dwellings shall be meeting 6 Green Star Standard (this is quite onerous) and commercial/business use buildings of a certain size shall meet 5 Green Star Standard.

The incentives for sustainable design in the draft plan are very prescriptive, and require detailed design consideration at the planning stage of a project. Council would require a verification/ certification system, probably contracting third parties such as NZGBC and Enviro-mark. It would be more appropriate to police any sustainability provisions through the Building Consent process, rather than the Resource consent process. However the standard is much higher than currently required by the national building code.

For commercial buildings, the 5-star standard is heavily reliant on CBD proximity to public transport, use of brownfield sites (for example, sites cannot be within 100m of a wetland), and sophisticated energy-management systems that may not be achievable.

Because of the significant certification and compliance ramifications presently involved with meeting these standards, we do not think their inclusion as a mandatory requirement in the Unitary Plan is a practical proposition at this stage.

We suggest it is more appropriate at present to take the approach that good behavior should be rewarded. The industry and society as a whole are only just beginning to understand the concept of building well and the benefits that can flow from it, and conversely, the troubles badly designed buildings bring about.

Proposition: Provide Bonuses for developers who meet certain sustainability standards, be this in added FAR, building coverage etc. Such bonuses may be time limited; for example they decrease over a number of years in line with accepted standards and expectations in the industry.

6.5 Ways and means to achieve good urban design

The Draft Unitary Plan exclaims in superlative language High Quality Outcomes for new developments over the next 30 years in the Auckland area. This is noted in the Strategic

Section of the UP where a number of objectives and policy bullet points are presented. A wonderful start.

However, the draft so far shows little or no concrete ways on how to achieve and secure these High Quality Urban Outcomes; or, in other words, how to allay fears in the community that these Quality Outcomes may not be achieved. And in all fairness, those voices in the various neighborhoods have reason to be concerned considering the generally poor outcomes to-date. And yet you can be sure that planners and officers of authorities past would never have wanted poor outcomes.

No arguments on the goal, but how can we assist AC to achieve it? What sort of mechanisms and rules we think should be integrated into the Unitary Plan or run alongside it a binding form that would bring about the best in urban design and quality construction that we architects can produce in the most effective way?

In this context, we note that the proposed non-statutory Architectural Design Manual (ADM) has not become available at the time the Draft Unitary Plan is up for consultation. Even though this Manual is produced as a guiding tool only, it is eagerly awaited in the design community to see how it fits the purpose.

The following comments and recommendations relate to seeking high quality design outcomes in the following zones/projects:

- Single house on a site
- Mixed Housing, Terrace Housing/Apartments & Local/Town/Metro Centres - Smaller Projects
- Mixed Housing, Terrace Housing/Apartments & Local/Town/Metro Centres - Larger Projects

Single dwelling on a site

Based on the NZIA's work during the stakeholders meeting phase, we continue to push for the approach that less prescriptive rules and more performance based parameters will bring about a greater likelihood of good and innovative design outcomes.

We should await all other inputs that are looking at the particular rules in this zone so they can be taken into account to finalize a formal response.

One criterion however should in our view always be at the center of any design process: a robust site analysis that includes such the critical aspects of orientation in context of sun light, wind and weather, climate, noise etc., that will affect the users of the building.

For example: In an east-west running flat suburban street such analysis will bring about quite different design responses on the northern side versus the southern side if nothing else because of its orientation.

The present consultation process reveals that Council is considering what it calls "Design Statements"(DS) become part of the application requirements of certain projects. This should be followed up with Council in detail to ascertain clarity about what is aimed for here because, apart from a scant mention of shadow affect, all criteria in such Council-proposed DS appear to relate to the Street and Neighborhood rather than the site of the applicant.

It should be noted that our feedback is offered subject to reviewing the yet to be published ADM. Such review should be viewed as an opportunity to "lift the bar" in single house design in general since one of the reasons for drafting such a Manual was to assist those developers that do not seek professional design assistance.

Mixed housing, terrace housing/apartments & local/town/metro centre: Smaller projects

This observation deals with smaller developments in the said zones, where a project interface with the public realm is minor and/or less significant. For instance, this may be an individual building that houses a few dwellings located in a Neighborhood Centre.

Firstly, a robust Site Analysis as above should be part of any application for development in this category.

Secondly, whether designed by a registered Architect or not, the best guarantee for an "acceptable" design solution may be the guidance, involvement and peer review by groups of professionals such as the Urban Design Panels despite their present lack

of statutory powers. Note the terms used: guidance, involvement, peer reviews. We anticipate two distinct situations here:

- a) A project starts and a designer believes he or she has produced an appropriate solution and proceeds to complete the design for planning approval. But when the Urban Design Panel considers the project it is critical of the proposed design.

At this point the developer and end-user starts incurring significant costs. The applicant/designer finds him/herself re-designing the project or perhaps starting anew, until Urban Design Panel / Council approves the design.

- b) The other option is that the designer seeks the Urban Design Panel's involvement early in the process in order to develop and complete the project design in a continuous fashion, then has the design approved by the Urban Design Panel / Council and applies for RMA approval. The developer is satisfied; fewer costs have been incurred and less time lost. Plus, in a broader sense, this result represents higher productivity in the building sector.

It is obvious that the second option is preferable in the end for all concerned. However, how can we encourage the parties involved to take up that option?

Proposition: The underlying principle here is that considered design behavior should be rewarded. Thus, the costs of the Urban Design Panel in this instance should be clearly identified and then discounted from the Project Planning Costs charged to the applicant. It should be noted that either option would be available to an applicant.

Another component of "High Quality Outcomes" may be "Sustainability". (Refer to comments under 6.4 above.)

Mixed housing, terrace housing/apartments & local/town/metro centres: Large projects

This observation deals with larger developments in the above zones, where a project interface with the public realm is significant. For instance, this may be a group of buildings with mixed uses in a commercial hub or even a master-plan for an urban complex where living, working and culture interface. Typically, the value of such projects is tens of millions of dollars.

Firstly, the robust Site Analysis as per chapter 1 above should apply to applications in this category and comments about Sustainability at the end of the above chapter 3 should also apply here.

Secondly, the comments in 6.4. above on "Sustainability" should apply here and can easily be integrated into the process described below.

Thirdly, however, there is another proposition to be added as described in 5.6. below. This relates to the questions of how to get the best out of designers, how to broaden the pool of design talent to shape the built environment and how to get the best and most innovative design at the earliest opportunity. The earlier we arrive at the best possible design solution, the more productive we are.

6.6 Design Competitions Policy

This path represents a positive solution all round: for the community, property developers, the architectural fraternity, as well as the Council.

Proposition: Well conceived and executed Design Competitions.

Christchurch has just led the way with the International Design Competition currently in progress in the re-build for an inner city block destined for housing.

Further, the City of Sydney operates a "Competitive Design Policy" in which an applicant is required to demonstrate that a proposed development of a certain type and area is the result of a competitive design process. This policy document, which is binding, was prepared by the City of Sydney in consultation with the Australian Institute of Architects and contains the detailed rules of design competitions.

It is difficult to argue that the best design results do not come about via a competitive design environment. A key criterion in successfully organized competitions is a clear and concise brief. The Urban Design Panel may well have a contributory role to play here. Furthermore, there are hundreds of case studies around the world that can inform the

competition process.

The costs of running such design competitions are not insurmountable; they may be in the vicinity of 1% of the say 30 million dollars+ project costs we are contemplating here.

Who pays? There are two options: the Council or the developer, i.e., the applicant.

- a) The Council: if the superlatives of the Unitary Plan Objectives are anything to look up to and go by, the Council can justify expenditure on design competitions.
- b) The developer: if the developer pays the costs then the developer should receive some sort of recompense in the project proper (this is generally provided for in the Sydney competitions document).

In sum, such a process involves all parties in the pursuit of a desirable outcome, and offers appropriate rewards to:

- The developer, for the risk of developing the land via a competitive design process
- the Architects, for the risks involved in taking part in the design competition;
- Auckland Council: for recognizing the importance of high quality design and enhanced community amenity by possibly funding the competition;
- Communities and rate-payers: for investing in a livable city

Recommendation: A Working party be set up by Auckland Council together with the NZIA and other key stakeholders, such as the Property Council, to discuss and draft a binding policy / rulebook on the requirements and details for a Competitive Design Environment / Competitions.

To arrive at the best design outcome in the most effective way for a place and community is by no means easy.

What can however be said with confidence is that no matter how the rules may change over time, to introduce the Urban Design Panel at the early stages of a project's design on the one hand, and to put in place a competitive design regime on the other, will always push us to do better.

Recommendations and Immediate Next Steps

7.1 Summary of Recommendations

1. The New Zealand Institute of Architects supports the adoption of a single plan for the Auckland region. This plan will provide opportunities to integrate other decisions (transport, community infrastructure, etc.) that will be essential if the future growth of Auckland is to be well managed. We duly recognize and commend the Council's efforts to produce this plan within the time it has; it is a huge undertaking.
2. We commend the development of the online format of the plan and maps and recognize the technological leap forward this represents. The launch of the draft has enabled a 'trial-run' of the system to identify areas of difficulty and where improvements can be made.

We endorse on-going development of the electronic format, exploiting its potential to transform the clarity efficiency and use of the new Plan, and be an important component in the acceptance of the Plan by the community.

3. The NZIA fully supports the Council in regard to many of the directions, objectives and in particular the focus on intensification in existing developed areas. The NZIA recognizes that this is the critical success factor of the plan. Should it fail, more rural land will need to be developed to support the growing population, with the consequent hidden costs of additional infrastructure, transport, and travel-time and so on. Infrastructure availability will be key – land-use planning needs to integrate with concurrent planning for transport and other infrastructure. The Institute and its members are ready, willing and able to assist Council in reaching the targets for land redevelopment within the rural urban boundary.
4. The NZIA strongly encourages the Council to undertake finer grain analysis in relation to the intensification areas and opportunities. With a 30-

year outlook and three year focus from Government, it is vital that these areas are correctly identified from the outset. Anomalies or inappropriate areas just open the Plan up to undue criticism. More considered analysis would ensure that the areas identified are practical, achievable and positive for the future of Auckland. A mechanism to enable this work to continue in parallel with the 3 year review period for the Unitary Plan would greatly assist in achieving the target for notification of the Unitary Plan on schedule in September this year.

The Institute and its members are happy and well-placed to assist and facilitate work to ensure the detail is right.

5. The NZIA supports the simplification of zoning by decreasing the number of zones applicable in Auckland, to reduce complexity and provide an environment for consistent decision-making.
6. We strongly recommend that the opportunity should be taken to similarly simplify the development control rules, many of which have been inherited from previous plans without full consideration. In particular the same development controls should apply across the different zones as far as possible. The complexity of the rules section of the plan we believe points to a serious shortcoming that can and should be positively addressed in the immediate next period of modifications. The detail is not a detail – it is fundamental to the shape of the outcome. The Institute's members have particular experience in this area and are ready willing and able to assist Council to formulate more appropriate rules to support the broad aims of the Auckland Plan.
7. The NZIA encourages the Council to undertake finer grain analysis in relation to connection and movement spaces, to achieve greater synergies between multi-mode transport systems and socio/economic activities in zones of more intensive development. This is an important component that has been neglected in the current draft.
8. The NZIA strongly encourages retention and reinforcement of the current controls that have ensured preservation and enhancement of Auckland's unique features both natural and man-made. Dilution

of these controls should not be pre-assumed as a necessity of intensification – on the contrary, the unique character of Auckland should be seen as the armature around which successful more intensive development can be absorbed.

9. We support the introduction of heritage overlays but, rather than adopting a blanket approach, encourage Council to undertake finer grain analysis to identify heritage on a site by site basis so as to assist in the process of regenerative development. The current Unitary Plan does not adequately address the question of heritage and more work and consultation with interested parties is required.
10. We note with concern that the draft Unitary Plan does not address the question of how a 'Quality First' City is to be delivered. Nor have we yet seen the promised Auckland Design Manual, and we are yet to be convinced whether this will improve quality or perhaps stifle creativity. The objective is surely to set a climate in which quality is encouraged and in which creativity can flourish.

We put forward the idea of a 'Partnership Memorandum' that will set down the way that the Unitary Plan is to work in practice, for all parties to clearly understand and buy into. This document would sit alongside the Unitary Plan.

11. The Institute and its members are committed to the vision set by the Auckland Plan and are ready, willing and able to assist Council in whatever way we can.

7.2 Immediate Next Steps

The New Zealand Institute of Architects strongly supports the acumen and determination of Mayor Len Brown and Deputy Mayor Penny Hulse in leading the drive to put in place the visionary Auckland Plan.

This early period of consultation on the draft Unitary Plan has highlighted two key factors:

One: there is a lot more work to do on the detail, and
Two: the community has become inextricably involved.

The pace of change dictates that at a point in time the Unitary Plan has to be issued for formal publication. The feedback may be daunting but does not alter this fundamental social and political reality. The schedule should be kept on track. To make this happen some decisive adjustments are needed, and a mechanism found by which work continues in parallel with the notification period. We want to be involved and to get behind the effort. We suggest some immediate next steps:

1. Strategy Meeting

To identify the key issues, prioritize them, identify what can be done in the short-term (before notification of the Plan) and what needs to be addressed in the longer term (in parallel with the Notification Period). We are uniquely placed to be involved with this.

2. Technical Meetings

Radical changes in some areas are required, in others just some minor adjustments. These need to be addressed on several fronts – a number of workshops will be required – we will be available to meet your needs.

3. Communications

The communications strategy will be vital. We have been relatively silent during the consultation period, while we have been getting to grips with what is involved. Now we will need to communicate our thoughts. We would like to be on the same page with Council.

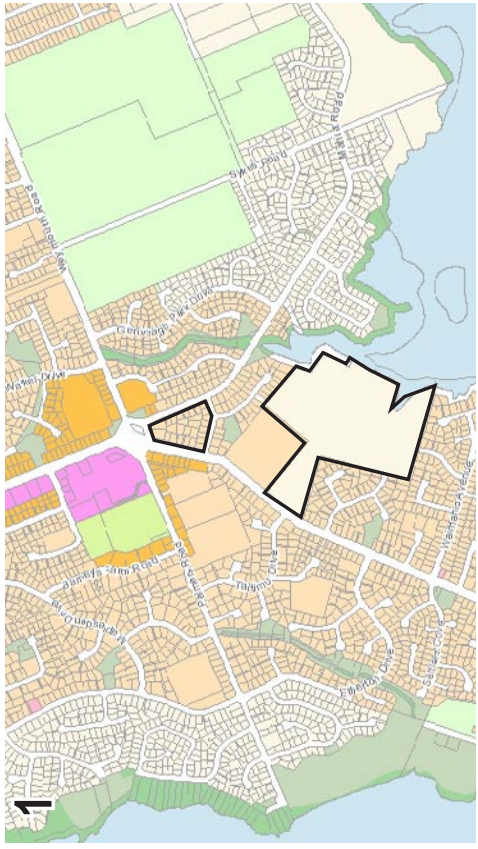
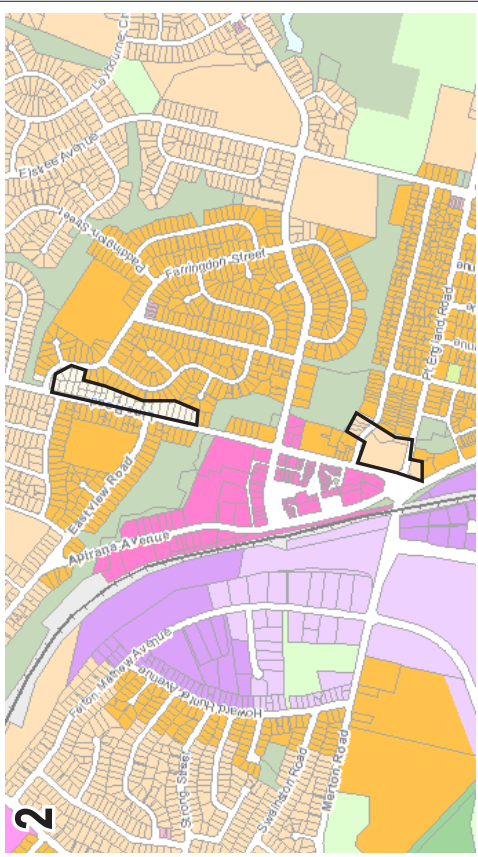
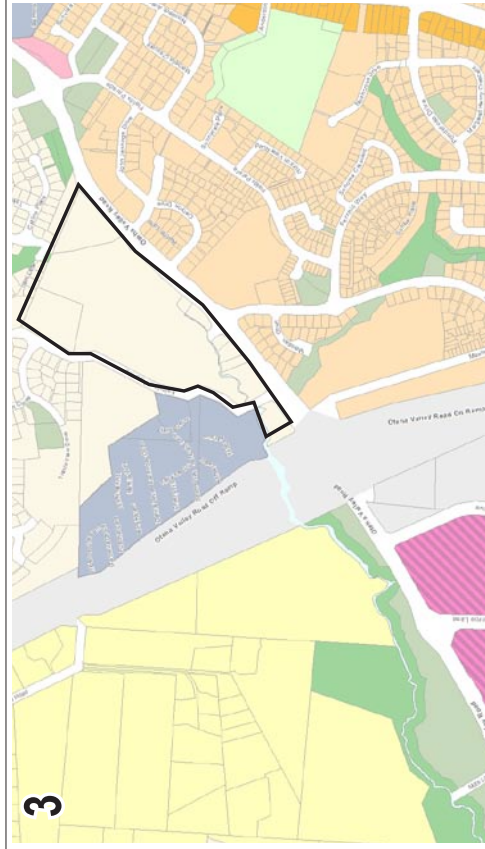
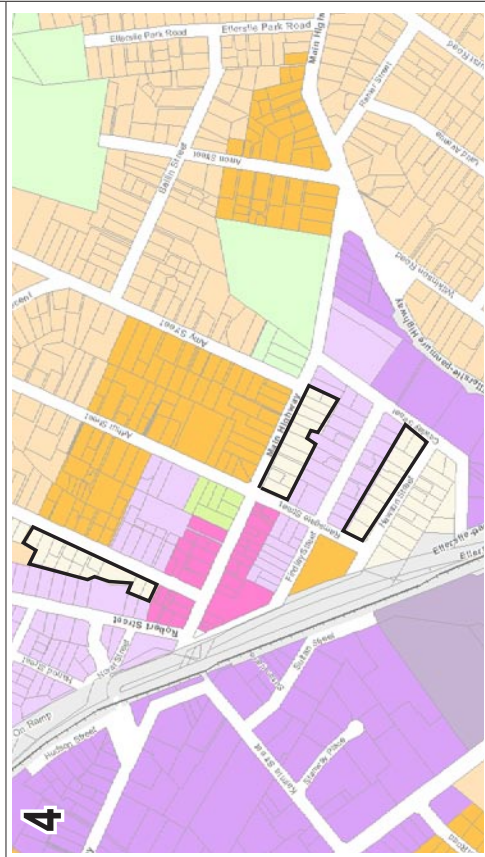
4. Resources

Please tell us how you want to involve us, what you need from us; we can suggest how we can help. Significant commitment may be required, so a plan will be needed.

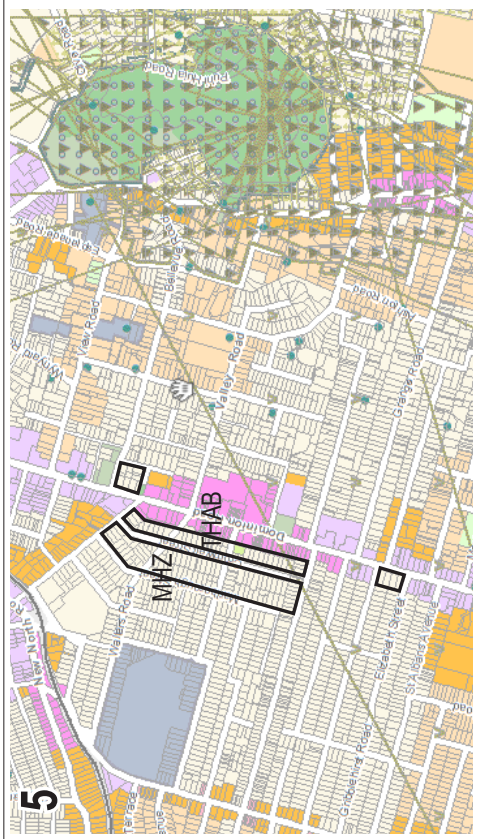
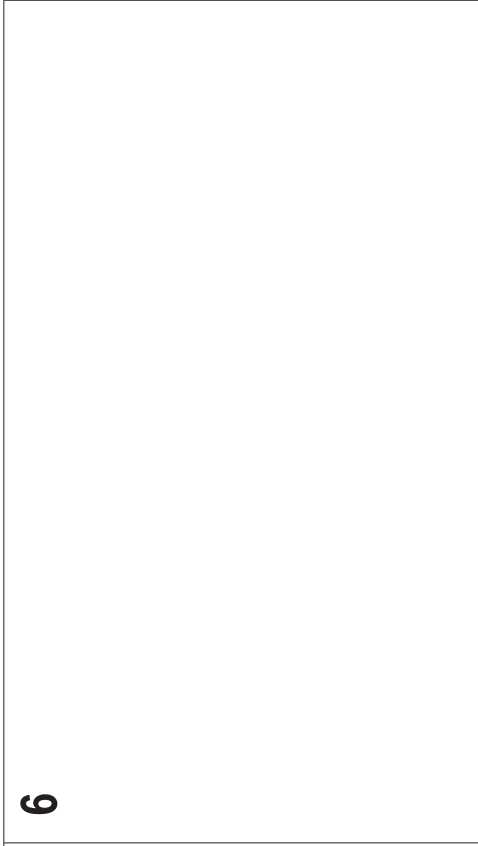
Appendix

INAPPROPRIATELY LOW PROVISION FOR DENSITY AROUND A TOWN OR METROPOLITAN CENTRE

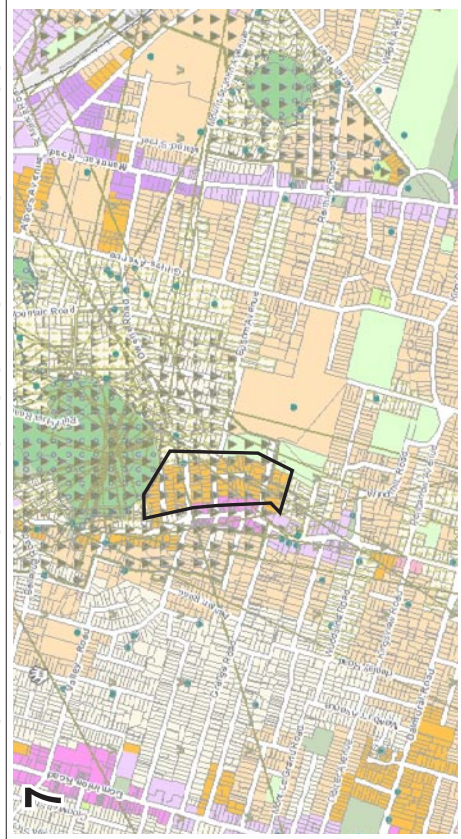

Appendix A: NZIA submission on Draft Unitary Plan: Intensification Section

	
Location	Point England
Unitary Plan zoning	Single House zone and Mixed Housing Zone
Recommended zoning	Terrace House & Apartment Zone
Notes	Strange islands of single and mixed housing zones in otherwise apartment zone. The current draft planning map fails to recognise the existing apartment complex within the Talbot Park area or the adjoining Point England Road area.
	
Location	Ellerslie Town Centre
Unitary Plan Zoning	Single House Zone
Recommended zoning	THAB or Mixed Use
Notes	SHZ doesn't make use of proximity to town centre. Becoming a highly sought after residential area where land values and proximity to the motorway and railway would support apartment type investment and development.

INAPPROPRIATELY LOW PROVISION FOR DENSITY AROUND A TOWN OR METROPOLITAN CENTRE

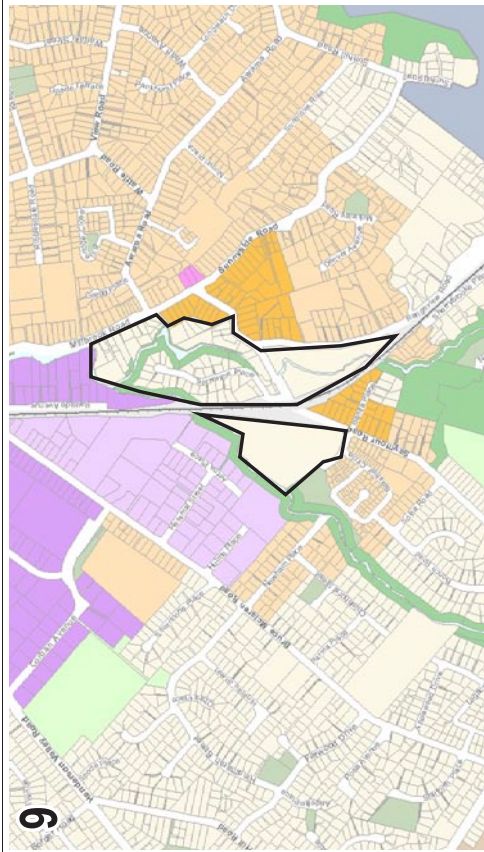
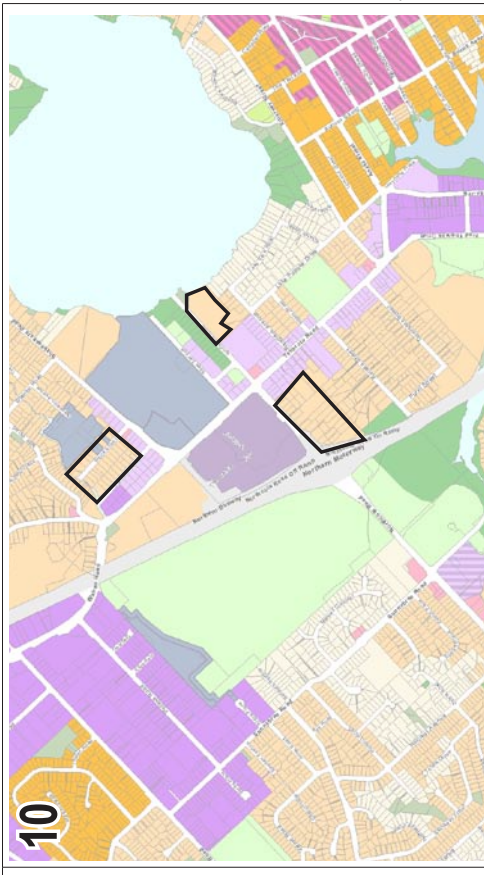
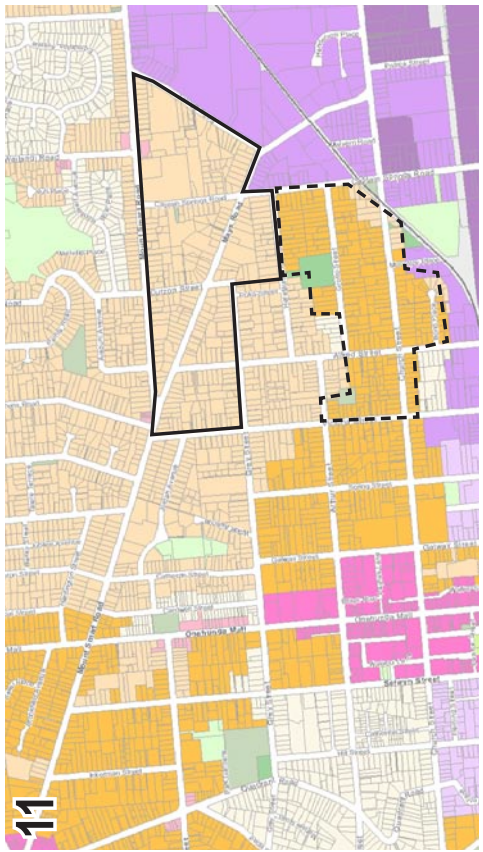
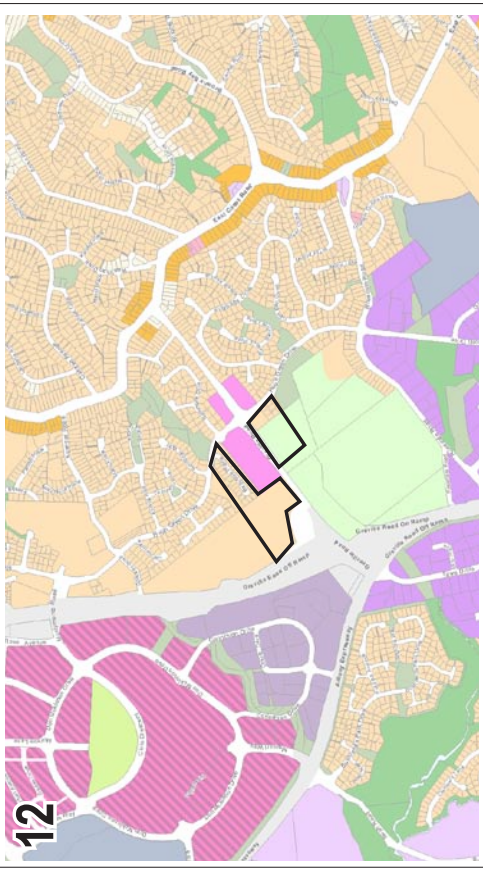
	
Location	Eden Valley Town Centre
Unitary Plan zoning	Single House Zone
Recommended zoning	THAB, Mixed Housing
Notes	SHZ doesn't make use of proximity to town centre. Highly sought after residential area where high land values would support apartment type investment and development.

INAPPROPRIATELY HIGH PROVISION FOR DENSITY AROUND A TOWN OR METROPOLITAN CENTRE

	
Location	Mt Eden Town Centre
Unitary Plan zoning	THAB
Recommended zoning	Mixed Housing
Notes	This apartment zone may be hard to reach potential under the volcanic cone protection.
Basque Reserve	
Mixed Use	
THAB	
Notes	This area is more appropriate as THAB zone as it can leverage off the amenity of the reserve. The nature of the land contour calls for the lower height limit in order to preserve the amenity of the open space.

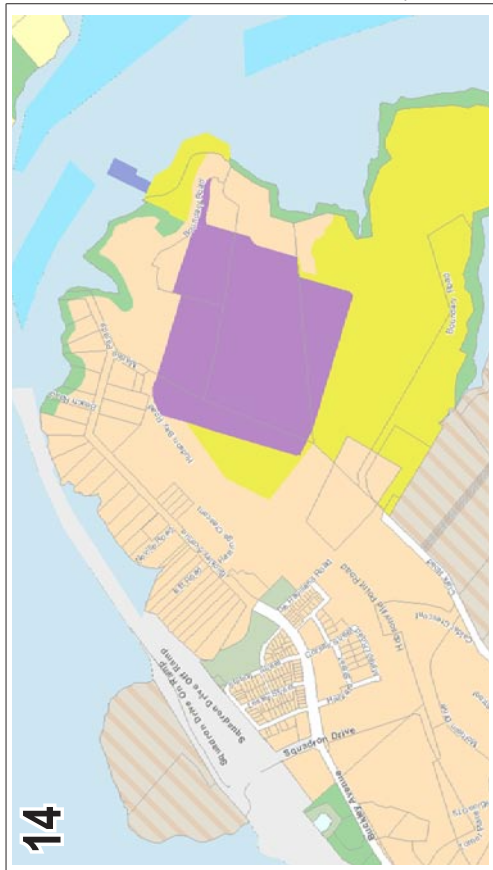
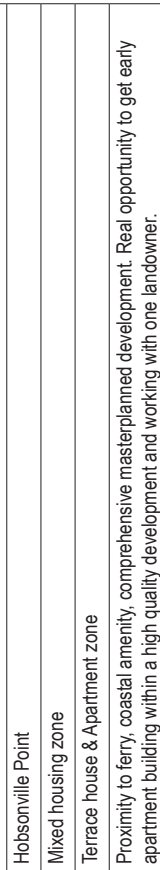


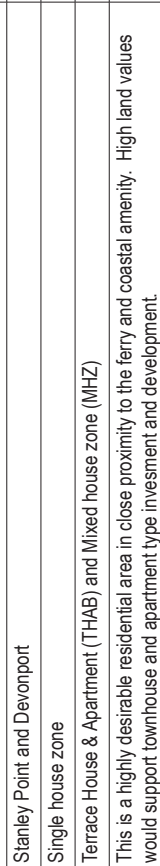


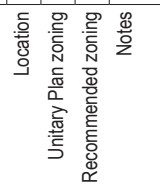

Appendix A: NZIA submission on Draft Unitary Plan: Intensification Section

LAND ADJOINING PUBLIC TRANSPORT NODE NOT UTILISED FOR DENSIFICATION

	
<p>Location</p> <p>Land adjacent to Sunnyvale Train Station</p> <p>Unitary Plan zoning</p> <p>Single house zone</p> <p>Recommended zoning</p> <p>Terrace housing + Apartment zone and local shops</p> <p>Notes</p> <p>In a flood plain but this could be designed around.</p>	<p>Residential areas around Smales Farm</p> <p>Mixed housing zone</p> <p>Terrace housing + Apartment zone</p> <p>Close to Smales Farm terminal of northern busway</p>
	
<p>Location</p> <p>Onehunga</p> <p>Unitary Plan Zoning</p> <p>Mixed Housing Zone</p> <p>Recommended zoning</p> <p>Terrace Housing & Apartment Zone</p> <p>Notes</p> <p>Area centred around the arterial of Mays Road has similar proximity to a transport route to the area shown dashed. It appears more likely to be developed due to larger lot sizes and connections to Mount Smart Road.</p>	<p>Greville Road</p> <p>Mixed housing zone</p> <p>Terrace House & Apartment zone</p> <p>Next to planned busway station, local centre and close to Albany Centre</p>

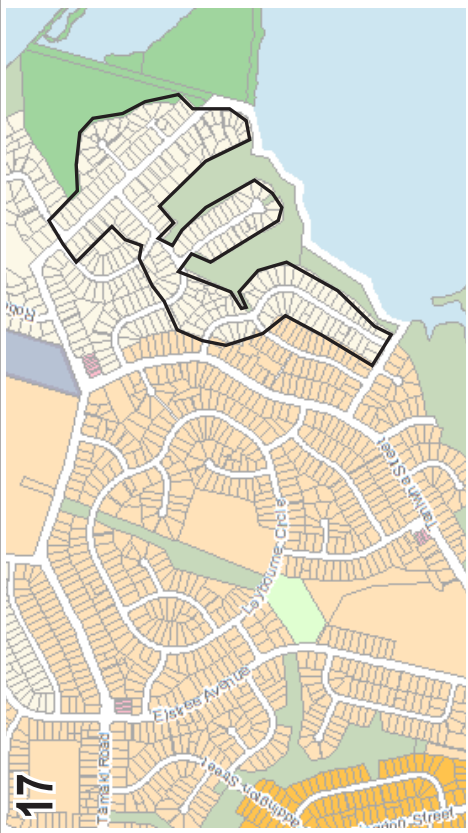
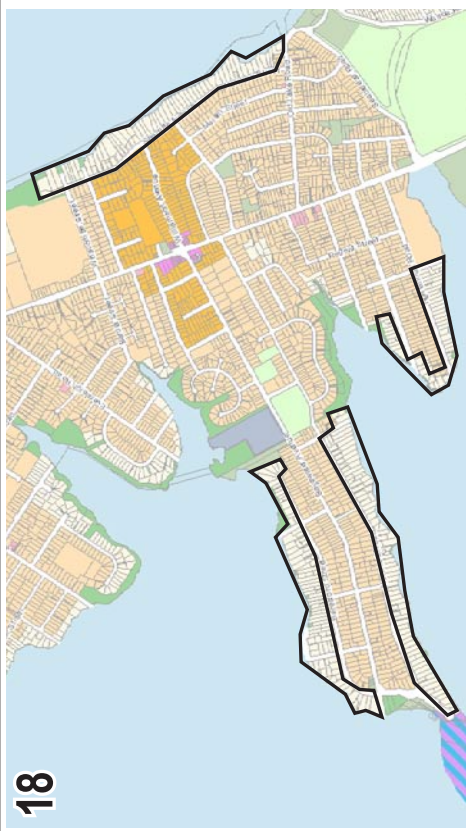
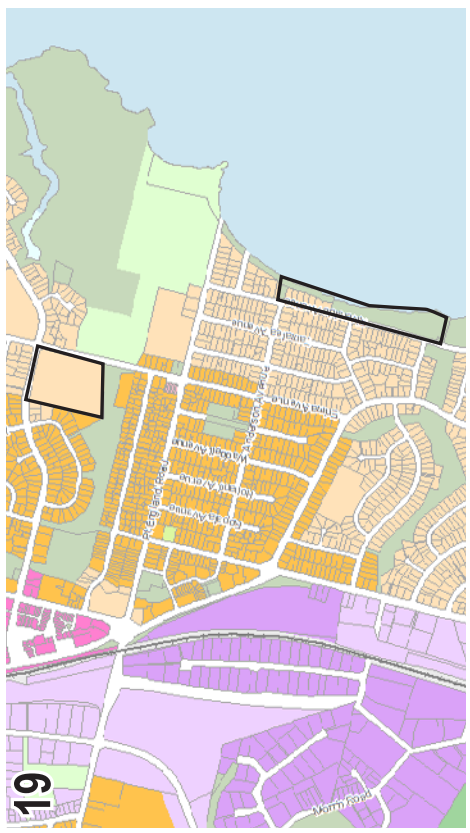

Appendix A: NZIA submission on Draft Unitary Plan: Intensification Section

LAND ADJOINING PUBLIC TRANSPORT NODE NOT UTILISED FOR DENSIFICATION

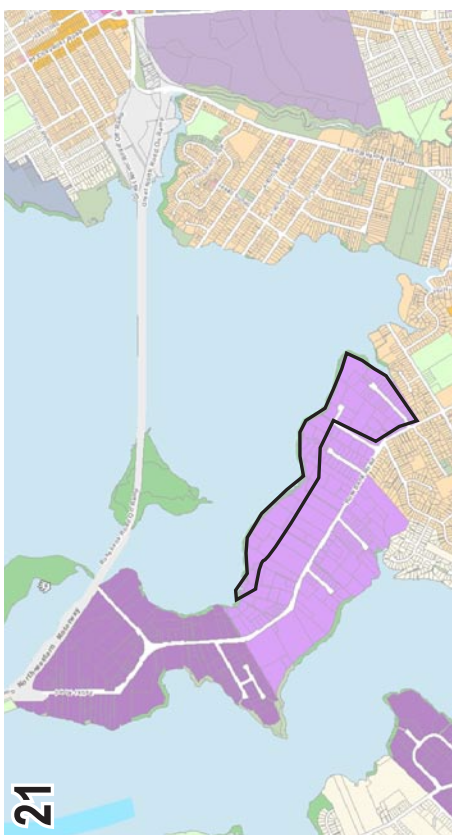
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Appendix A: NZIA submission on Draft Unitary Plan: Intensification Section


LAND ADJACENT TO PHYSICAL OR VISUAL AMENITY NOT UTILISED FOR DENSIFICATION

 <p>17</p>	 <p>18</p>
Location	Seaclyffe Avenue, Hamana St, Norwood Rd, Beresford St - Bayswater
Unitary Plan zoning	Single house zone
Recommended zoning	Mixed housing zone
Notes	Suburb amenity offered by Tamaki Estuary, abundance of public parkland not utilised for density. Access to underutilised local state schooling - private schooling opportunities also available.
 <p>19</p>	 <p>20</p>
Location	Kiwi Esplanade, Mangere Bridge
Unitary Plan Zoning	Single house zone
Recommended zoning	Terrace House & Apartment zone
Notes	This area is a north facing coastal area, becoming a desirable area to live, where high land values would encourage private owners to invest in apartment type redevelopment.

LAND ADJACENT TO PHYSICAL OR VISUAL AMENITY NOT UTILISED FOR DENSIFICATION

<p>21</p> 	<p>22</p>
<p>Location</p>	<p>Rosebank Road, Avondale</p>
<p>Unitary Plan zoning</p>	<p>Light and heavy industrial</p>
<p>Recommended zoning</p>	<p>Mixed Use or Apartment Zoning</p>
<p>Notes</p>	<p>Currently large undeveloped parcels of land provide opportunity to take advantage of excellent solar orientation and sea views. Potential to provide affordable housing in the form of apartments + townhouses in walking distance to employment areas.</p>

PLANNING MAP OVERLAYS (EG PRE 1944 DEMOLITION CONTROL) EFFECTIVELY PRECLUDE DENSIFICATION

<p>23</p> 	<p>24</p>
<p>Location</p>	<p>Mt Albert</p>
<p>Unitary Plan overlay</p>	<p>Blanket overlay</p>
<p>Recommended overlay</p>	<p>Remove blanket approach to demolition control and substitute a fine grained street by street approach based on merit.</p>
<p>Notes</p>	<p>Extent of pre 1944 bungalows means that redevelopment potential is very low.</p>

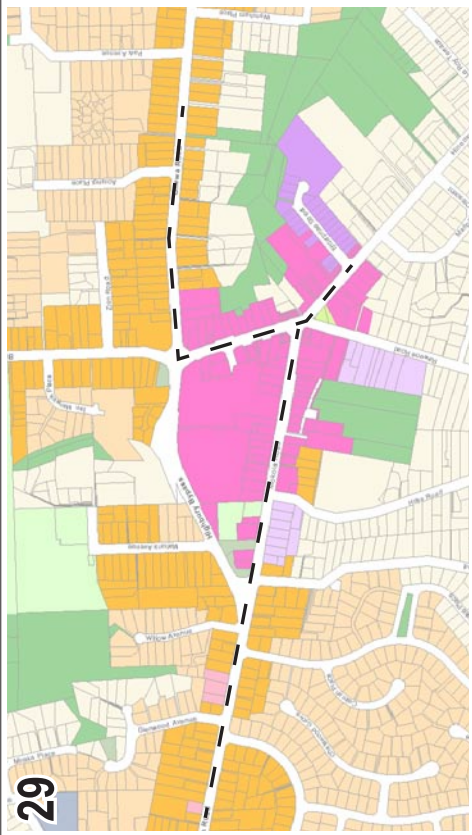
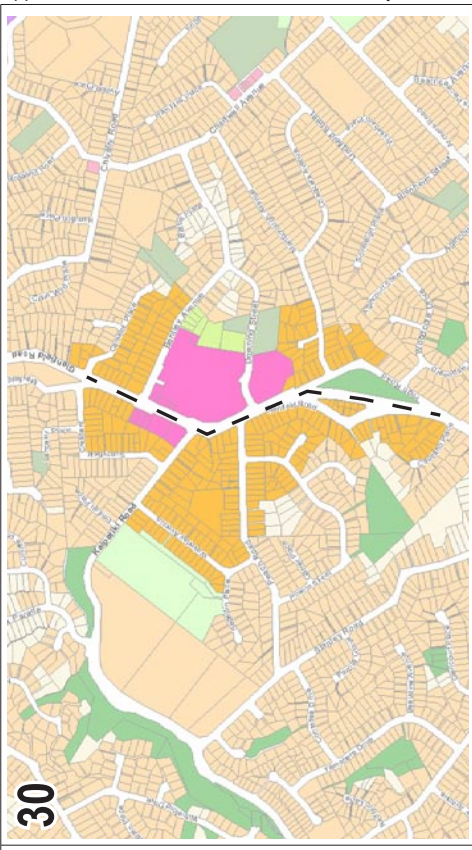
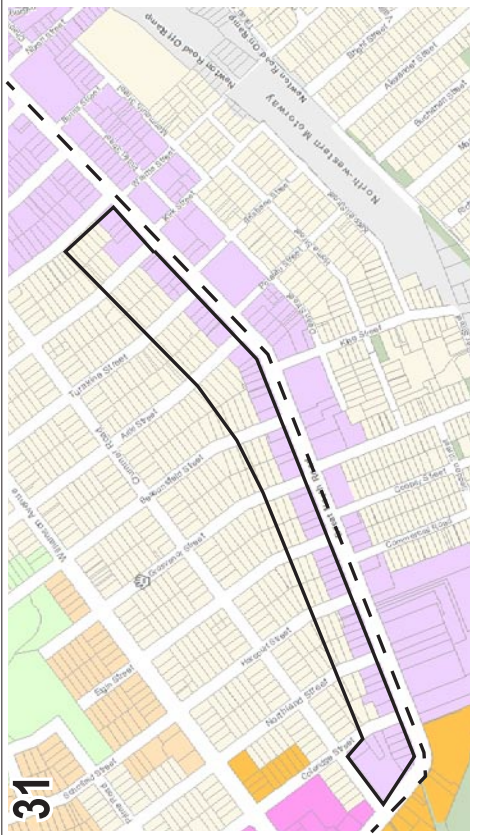
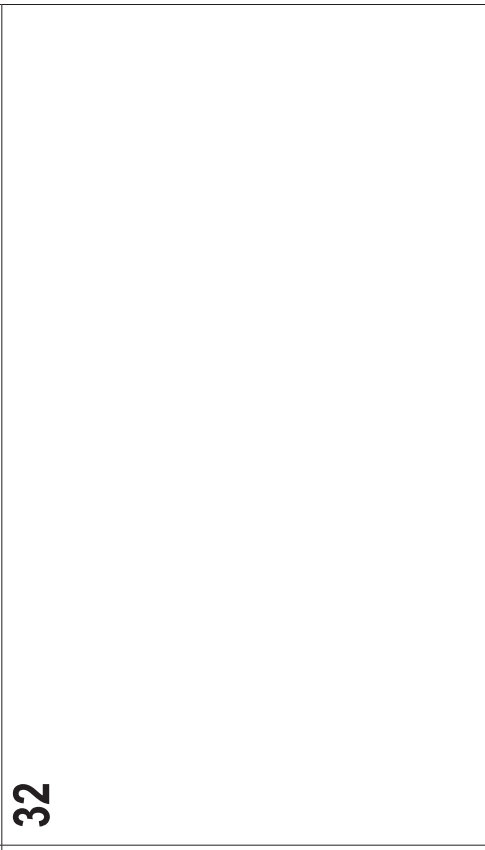
Appendix A: NZIA submission on Draft Unitary Plan: Intensification Section

LARGE GREENFIELD SITES - NOT UTILISED FOR DENSIFICATION

<p>25</p>	<p>26</p>
<p>Location</p> <p>Gills Road, Albany</p>	<p>Wattle Downs Golf courses, Manurewa</p>
<p>Unitary Plan zoning</p> <p>Single house zone</p>	<p>Single house zone</p>
<p>Recommended zoning</p> <p>Mixed housing zone</p>	<p>Mixed housing zone</p>
<p>Notes</p>	<p>Fletcher Residential has entered into a purchase agreement with the Manukau Golf Course. Any new residential development should include a range of housing choices and affordable housing models. Upzoning would increase land value and create an opportunity for the site to be comprehensively redeveloped.</p>
<p>27</p> <p>27</p>	<p>28</p> <p>28</p>
<p>Location</p> <p>Long Bay</p>	
<p>Unitary Plan zoning</p> <p>Single house zone</p>	
<p>Recommended zoning</p> <p>Mixed housing zone</p>	
<p>Notes</p> <p>Superb amenity, comprehensively masterplanned with new infrastructure, village centre, public transport and parks - under-utilised for density. Based on high land values in this location this is a significant opportunity to encourage residential intensification on the North Shore where opportunities of this scale are limited.</p>	

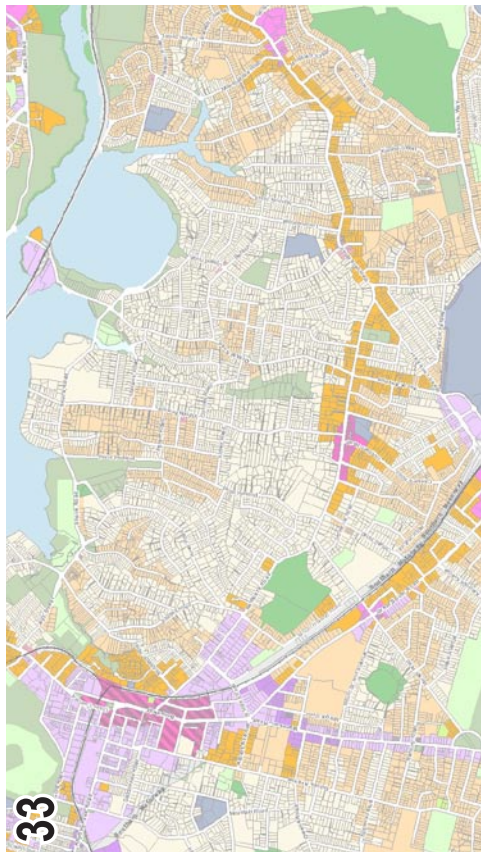
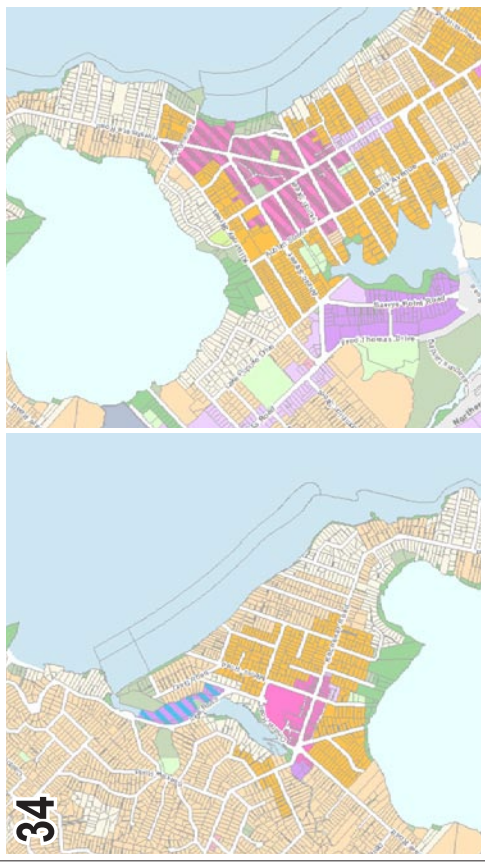


Appendix A: NZIA submission on Draft Unitary Plan: Intensification Section

RIDGELINES NOT BEING UTILISED FOR DENSIFICATION

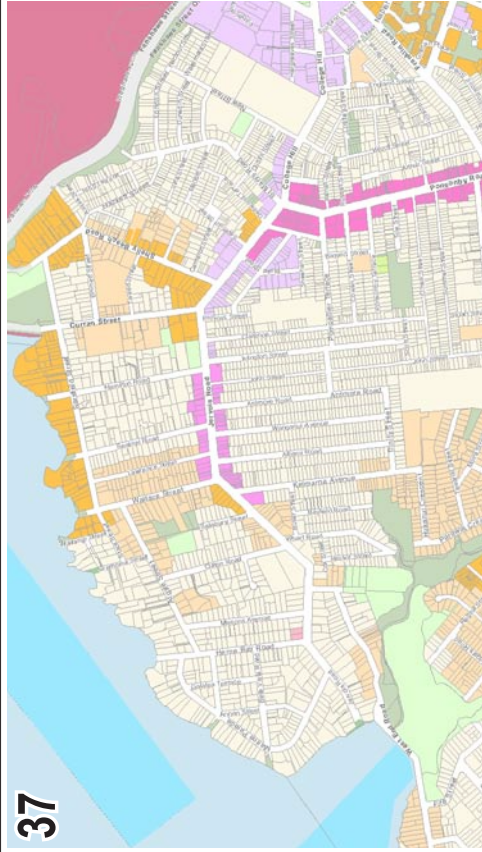

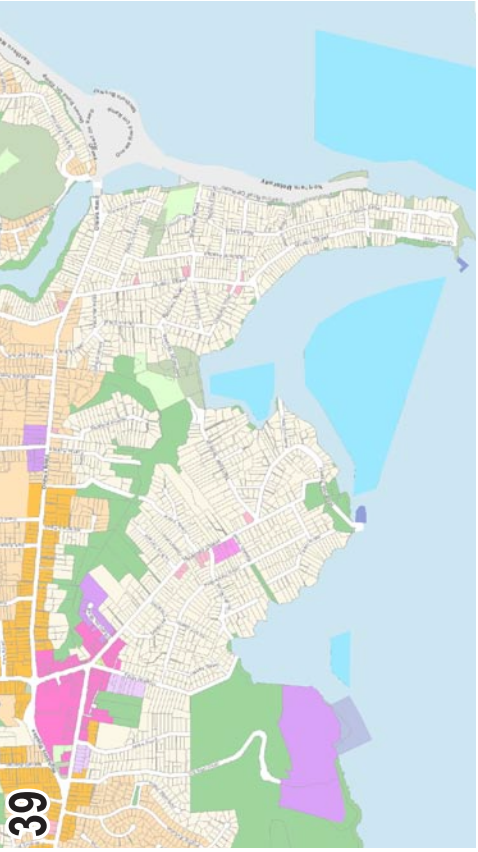

	
Location	Glenfield
Unitary Plan zoning	varies
Recommended zoning	extra height
Notes	Is on a ridge with some of the most stunning views the city has, yet is limited in height to 6 storeys. Additional height will have minimal effect on surrounding sites.
	
Location	Great North Road
Unitary Plan Zoning	Single House Zone
Recommended zoning	Mixed Use
Notes	Enlarge the MU zone to capitalise on the excellent solar orientation, views and location of this area. Significant opportunity to upzone for residential intensification where high land values support redevelopment along a major transport route with supporting shops and cafes.

Appendix A: NZIA submission on Draft Unitary Plan: Intensification Section

LAND IN MARKET-ATTRACTIVE AREAS NOT UTILISED FOR INTENSIFICATION

	
<p>Location</p> <p>Remuera</p> <p>Unitary Plan zoning</p> <p>Single house zone</p> <p>Recommended zoning</p> <p>Mixed housing zone + THAB</p>	<p>Milford and Takapuna</p> <p>Single house zone</p> <p>Mixed housing zone + THAB</p>
<p>Notes</p> <p>Significant opportunity to upzone for residential intensification where high land values support redevelopment along a major transport route with supporting shops and cafes.</p>	<p>Significant opportunity to upzone for residential intensification where high land values support redevelopment along a major transport route with supporting shops and cafes.</p>
	
<p>Location</p> <p>Ponsonby, Heme Bay, Pt Chevalier</p> <p>Unitary Plan Zoning</p> <p>Single house zone</p> <p>Recommended zoning</p> <p>Mixed housing zone + THAB</p>	<p>Eastern Bays</p> <p>Single house zone</p> <p>Mixed housing zone + THAB</p>
<p>Notes</p> <p>Significant opportunity to upzone for residential intensification where high land values support redevelopment along a major transport route in a high amenity area with supporting shops and cafes.</p>	<p>Significant opportunity to upzone for residential intensification where high land values support redevelopment within a high amenity area.</p>

INAPPROPRIATE “ROLL OVER” OF OLD LOW DENSITY RESIDENTIAL ZONINGS TO SINGLE HOUSE ZONE

	
<p>Location Unitary Plan zoning Recommended zoning Notes</p>	<p>Devonport - current zoning: ex-NSCC Residential 3 Single House zone Mixed housing zone + THAB Significant opportunity to upzone for residential intensification where high land values support redevelopment within a high amenity area with supporting shops and cafes.</p>
	
<p>Location Unitary Plan Zoning Recommended zoning Notes</p>	<p>Birkenhead Point and Northcote Point - current zoning: ex-NSCC Residential 3 Single House zone Mixed housing zone + THAB Significant opportunity to upzone for residential intensification where high land values support redevelopment within a high amenity area with supporting shops and cafes.</p> <p>Mission Bay - current zoning: ex-Auckland City Council Residential 2B, Residential 5 Single house zone Mixed housing zone + THAB Significant opportunity to upzone for residential intensification where high land values support redevelopment within a high amenity area with supporting shops and cafes.</p>