

Waimakariri District Council,
215 High Street
Private Bag 1005,
Rangiora, 7440

Via email: developmentplanning@wmk.govt.nz

24 November 2021

To Whom it May Concern,

RE: SUBMISSION IN OPPOSITION TO THE PROPOSED ZONING OF 71 ADDERLEY TERRACE

The following is a submission in opposition to the proposed zoning of 71 Adderley Terrace under the Proposed Waimakariri District Plan. This submission has been prepared by Urbis TPD Ltd on behalf of Kāinga Maha.

Kāinga Maha is a property development company committed to helping communities flourish. Kāinga Maha translates to ‘*many homes*’ and reflects their mission to ensure everyone in Aotearoa has a place and community to call home. Kāinga Maha considers that good communities come from good partnerships. They promote affordable housing developments as part of a team, partnering with a landowner, Mana Whenua, engineers, construction companies, housing providers, councils, central government and the land itself. Recent affordable housing projects undertaken by Kāinga Maha include:

- Pirirākau in Ōpōtiki (eastern bay of Planty). This development unlocks land in Ōpōtiki for 46 residential lots made available to the local community. Intended for families in the community, this gives the opportunity to build a mix of affordable homes on sections ranging from 290m² to 500m². Project value of \$8 million;
- The Residences at Karamū. This development provides 84 *Homestar 6 and 7* 2-3 bedroom homes, situated over five super lots. This development is designed in accordance with MHUD guidelines. Incorporating smart-home technology and with an emphasis on sustainability and affordability. Project value of \$42 million;
- Parkview in Rolleston. This development provides 14 new 3-bedroom homes. Project value of \$5.6 million, and;
- Hutt Road, Manurewa. This development provides 21 two-bedroom apartments within a three-level, walk-up apartment complex. Designed to foster a flourishing community, the development includes undercroft parking, shared communal spaces and a community garden. Kāinga Maha, partnering

with Home Construction and Iosis, have been able to save significant costs in this project. This means this development is viable for Iosis, while still being suitable for both Ministry of Housing and Urban Development housing and local Community Housing Providers, Habitat for Humanity.

Kāinga Maha is seeking to develop 71 Adderley Terrace with a similar type of, yet affordable, housing development that builds on their proven track record of delivering high quality developments that meet community aspirations.

Site Description

The site of relevance to this submission is 71 Adderley Terrace, Kaiapoi as shown in Figure 1 below. The site is located to the north of the Kaiapoi Cemetery. The site has a total area of 6,152m² with a single access to the site from Adderley Road. The boundaries are heavily landscaped.

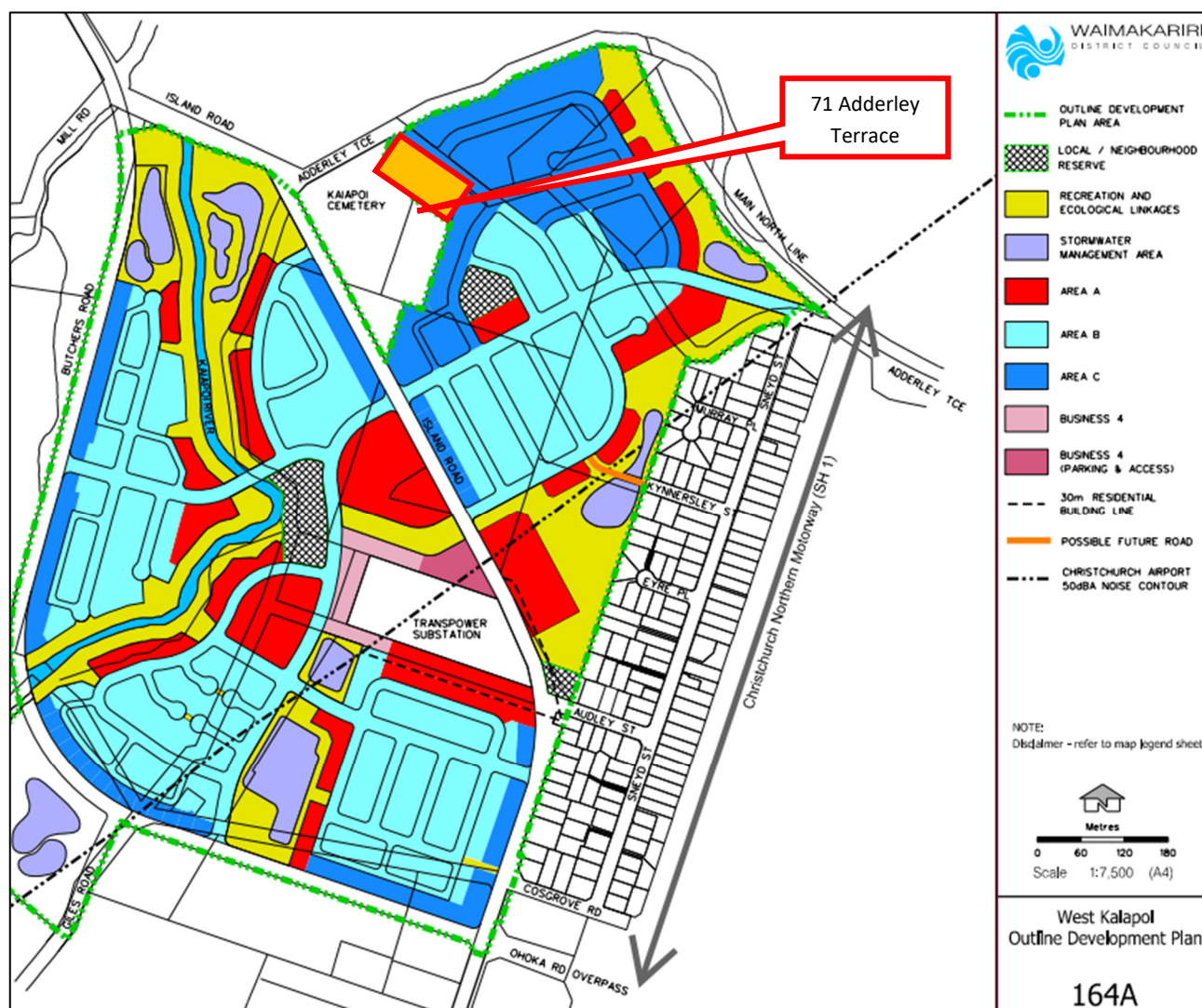


Figure 1: Location of 71 Adderley Terrace.

Site Zoning

Operative Zoning

Under the Operative District Plan this site is zoned Residential 7, Area C. This allows for a minimum allotments size of 500m² that must be able to contain a 15mx 15m square. However, within the wider 'Silverstream' subdivision, allotments sizes as small as 150m² are allowed in specified locations shown in red on planning map 164 A as shown below. The point to note is that the wider subdivision has already been identified as being suitable for high density housing, with the highest density being spread throughout the subdivision. This variety in density within a given land area is a concept supported by Kāinga Maha because it integrates all wealth levels within a given community.



Proposed Zoning

The Proposed Waimakariri District Plan seeks to zone this site as General Residential Zone (GRZ). The purpose of this zone is described as follows:

“the General Residential Zone is to provide for residential areas predominantly used for residential activity, with a mix of building types, and other compatible activities that provide for maintenance or enhancement of residential amenity values. Activities provided for include community facilities, health care facilities, places of assembly and other activities that are at a scale and generate a range of effects that is consistent with residential character.”

In this zone the minimum allotment size is 500m² (SUB-S1), the minimum site density is one residential unit per 500m² (GRZ-BFS1) and there is a maximum site coverage of 45% (GRZ-BFS2). Put simply, the proposed zoning is essentially no different to what is operative.

However, Kāinga Maha considers that this site is ideal for a higher density development such as that afforded by the operative Area A rules or the proposed District Plan Medium Density Residential Standards or, alternately, the design standards being promoted with the proposed amendment bill to the NPS-UD 2020. Either option will provide for more intensive housing development. Relevant design rules from both documents is appended to this submission.

Relief Sought

In order to provide higher density living in Kaiapoi, which is in line with the national push for increased housing densities and supply, this submission seeks for the proposed zoning of 71 Adderley Terrace to be amended.

Noting that the Councils District Plan Review is concurrent with the proposed amendment bill to NPS-UD 2020, which may significantly alter the built form standards, this submission seeks either of the following for its relief;

- a) That the rules governing this site reflect the Medium Density Residential Standards as proposed under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill;
- b) Or alternatively, if the bill is rejected that the site instead be rezoned as Medium Density Residential Zone under the proposed rules.

Reasons For Relief Sought

NPS-UD 2020

The National Policy Statement on Urban Development 2020 requires consenting authorities to allow for increased urban development. As part of the greater Christchurch area, Kaiapoi is considered a Tier 1 urban environment.

Further to this, the Resource Management (enabling Housing Supply and Other Matters) amendment bill is currently being reviewed by a select committee. This amendment bill will bring forward the timeline implementation of the NPS and, more importantly will require Tier 1 local authorities to implement medium density residential standards in all residential zones, this includes application site.

Increased Density

Regardless of the outcome of the amendment bill, the Council is aware of the need for increased residential density. This was noted in their submission to the proposed amendment bill. There is also common theme throughout the submissions from consenting authorities, including the Waimakariri District Council, that while higher density development is required, it should be directed towards commercial centres. In the case of the Proposed Waimakariri District Plan these centres are considered the Town Centre Zones.

The Waimakariri submission sought to place the required higher density within 1km of the Town Centre zones. The reasons for this being that higher residential development should be places where it will be well-served by public transport or areas where local schools and other social and community infrastructure have the capacity.

This is relevant to the site as despite being over 1km from the Town Centre Zone of Kaiapoi, Adderley Terrace is still within 2km of the main commercial zone of Kaiapoi and on a road with a bus route which crosses underneath State Highway 1. This meets the requirement for being located with easy access to the local commercial centre. There is also sufficient infrastructure to support an increase in density at this location as well. This includes open spaces, schools and local commercial activities which support residential development

Because of this, regardless of the outcome of the bill the Adderley Terrace site can be seen as an appropriate location for increased density. Considering the currently proposed rules up to 12 dwellings could be erected on this if it is zoned as GRZ. Under the MRZ rules this could be increased to over 20 dwellings, a significant increase in the housing supply for Kaiapoi.

Conclusion

To reiterate, this submission opposes the of the proposed General Residential Zone (GRZ) zoning of 71 Adderley Terrace under the Proposed Waimakariri District Plan and instead seeks:

- a) That the rules governing this site reflect the Medium Density Residential Standards as proposed under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill;
- b) Or alternatively, if the bill is rejected that the site instead be rezoned as Medium Density Residential Zone under the proposed rules.

Presentation of Submission

We wish to be heard in support of this submission.

If others make similar submissions, we will consider presenting a joint case at any hearing.

Yours sincerely,



Callum Ross

Planner

URBIS TPD LIMITED

Appendix A – Contemporary Residential High-Density Design Standards

Proposed District Plan - MRZ Relevant Rules

The proposed rules for the MRZ are as follows;

- Minimum allotment size of 200m² (with no minimum size for multi-unit residential development (SUB-S1);
- Minimum site density of 1 unit per 200m² (MRZ-BFS1); and
- Maximum site coverage of 55% (MRZ-BFS2).

Amendment Bill to the NPS-UD 2020 - Medium Density Residential Standards.

- Buildings must not exceed 11 metres in height, except that 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed this height by 1 metre, where the entire roof slopes 15° or more, as shown on the following diagram:
- Buildings must not project beyond a 60° recession plane measured from a point 6 metres vertically above ground level along all boundaries, as shown on the following diagram. Where the boundary forms part of a legal right of way, entrance strip, access site, or pedestrian access way, the height in relation to boundary applies from the farthest boundary of that legal right of way, entrance strip, access site, or pedestrian access way
- Buildings must be set back from the relevant boundary by the minimum depth listed in the yards table below:

Yard	Minimum depth
Front	2.5 metres
Side	1 metre
Rear	1 metre (excluded on corner sites)

- The maximum building coverage must not exceed 50% of the net site area
- The maximum impervious area must not exceed 60% of the site area.
- A residential unit at ground floor level must have an outdoor living space that is at least 15 square metres and that comprises ground floor or balcony or roof terrace space that,—

- a) A residential unit at ground floor level must have an outdoor living space that is at least 15 square metres and that comprises ground floor or balcony or roof terrace space that,—
 - b) where provided in the form of a balcony, patio, or roof terrace, is at least 8 square metres and has a minimum dimension of 1.8 metres; and
 - c) is accessible from the residential unit; and
 - d) is free of buildings, parking spaces, and servicing and manoeuvring areas.
- An outlook space must be provided from habitable room windows as shown in the diagram below. Where the room has 2 or more windows, the outlook space must be provided from the largest area of glazing.
 - The minimum dimensions for a required outlook space are as follows:
 - a) a principal living room must have an outlook space with a minimum dimension of 3 metres in depth and 3 metres in width; and
 - b) all other habitable rooms must have an outlook space with a minimum dimension of 1 metre in depth and 1 metre in width.
 - The width of the outlook space is measured from the centre point of the largest window on the building face to which it applies.
 - Outlook spaces may be within the site or over a public street or other public open space.
 - Outlook spaces must—
 - a) be clear and unobstructed by buildings; and
 - b) not extend over an outlook space or outdoor living space required by another dwelling.

Subdivision requirements

Without limiting clause 5,—

- a) (a)there must be no minimum lot size, shape size, or other size-related subdivision requirements for the following:
 - i. any allotment with an existing residential unit, if the subdivision does not increase the degree of any non-compliance with the building standards set out in Part 2:
 - ii. any allotment with no existing residential unit, or for which no existing land use consent for a residential unit has been granted, or (in the case of joint land use and subdivision

applications) for which applications are being concurrently considered, if it can be demonstrated by the applicant for the resource consent—

A. that it is practicable to construct on every allotment within the proposed subdivision, as a permitted activity, a residential unit; and

B. that each residential unit complies with the building standards set out in Part 2:

b) there must be no minimum lot size, shape size, or other size-related subdivision requirements for the subdivision of land around residential units if—

i. they are approved under a land use resource consent; and

ii. no vacant allotments are created.