

17 May 2023

Attn: Hamilton City Council
Private Bag 3110,
Hamilton 3240
Submission via email: haveyoursay@hcc.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON
PROPOSED PLAN CHANGE 15 – TUUMATA RUAKURA PRIVATE PLAN
CHANGE TO THE OPERATIVE HAMILTON CITY DISTRICT PLAN**

This is a submission on Proposed Plan Change 15 – Tuumata Ruakura Private Plan Change (“PC15”) to the Operative Hamilton City District Plan (“the Plan” or “the District Plan”), prepared by Tainui Group Holdings Industrial Development Limited (“TGH”):

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

The specific provisions of the proposal that this submission relates to:

PC15 to the District Plan in its entirety.

This document and the attached Appendix is Kāinga Ora submission on PC15.

The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities ("**Kāinga Ora**") is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across Hamilton City.
3. Kāinga Ora therefore has an interest in PC15 and how it:
 - (a) Gives effect to the National Policy Statement on Urban Development ("**NPS-UD**") and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 ("**the Housing Supply Act**");
 - (b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
 - (c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. By way of an overview, the Kāinga Ora submission generally supports the rezoning of the land identified for residential use within the Ruakura Structure Plan area and the inclusion of the Medium Density Residential Standards ("**MDRS**") as required by clause 25(4A) of Schedule 1 of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act ("**HSAA**").

5. The relief and amendments sought from Kāinga Ora can be found in more detail in:
 - (a) **Appendix 1 – Table 1:** Identifies the specific submission points and amendments that Kāinga Ora either supports, opposes or seeks amendment to PC15.
6. It is acknowledged that there is a difficulty in the timing for PC15, in which it will go through the Schedule One process, alongside Hamilton City Council's intensification plan change ("**PC12**"). PC12 is currently progressing through the Intensification and Streamlined Planning Process ("**ISPP**"), with an anticipated adoption date no later than May 2024.
7. The Kāinga Ora submission is that provisions relating to the proposed Tuumata Precinct ("**Precinct**") should be streamlined to reduce any repetition that would arise as a result of the adoption of PC12 by May 2024.
8. As such, Kāinga Ora seeks that the General Residential Zone proposed through PC12, subject to relief sought through the Kāinga Ora submission on PC12, be applied across the Precinct as part of PC15.
9. Kāinga Ora supports the manner of which the provisions proposed through PC15 have generally sought to give effect to Te Ture Whaimana o Te Awa o Waikato ("**Te Ture Whaimana**"). It is imperative that the continued development of Hamilton City is done in a manner that has the health and wellbeing of the Waikato River at the forefront, whilst accommodating urban growth to meet demand, in the most sustainable way.
10. The Ruakura Structure Plan is excluded from the proposed Infrastructure Capacity Overlay ("**the Overlay**") proposed through PC12. Therefore, despite reference to the Overlay within the proposed provisions of PC15, any development within the Precinct will not be subject to the density standards that would otherwise be applied to land located within the Overlay. Notwithstanding the relief sought by Kāinga Ora through PC12, with chapter 25.13 being a city-wide chapter, once PC12 is operative it is envisaged that the applicable trigger for the consideration of infrastructure capacity would be the development of 4 or more dwellings. Kāinga Ora supports this approach insofar it is consistent with the relief sought by Kāinga Ora through PC12 and is considered to be an acceptable balance between enabling development via the District Plan and considering the impact that urban development may have on the infrastructure network of Hamilton City.

Kāinga Ora seeks the following decision from Hamilton City District Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in **this submission document and Appendix 1**, are accepted and adopted into PC15, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Kāinga Ora wishes to be heard in support of their submission.

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on PC15 to address the matters raised in its submission.

If others make a similar submission, Kāinga Ora are happy to consider presenting a joint case at a hearing.



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Appendix 1: Decisions sought on PC15

The following table sets out the amendments sought to the PC15 and also identifies those provisions that Kāinga Ora supports.

Table 1 Key

Identifier	Text or Amendments made by:
Black text	Operative District Plan provisions/text
<u>Red underlined</u>	PC15 additions as sought by Tainui Group Holdings
Red strikethrough	PC12 deletions as sought by Tainui Group Holdings
<u>Blue underlined</u>	Proposed additional text sought by Kāinga Ora
Blue strikethrough	Deletions proposed by Kāinga Ora

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought <i>Kāinga Ora proposed changes in Proposed Plan Change 5 are shown as throughout for deletion and <u>underlined</u> for proposed additional text</i>
General / All of Plan Change					
1.	Spatial application – General Residential Zone within the Precinct	All of plan change	Support in part	Kāinga Ora support the application of the General Residential Zone within the Tuumata Residential Precinct; however, the provisions should be streamlined to reflect both what has been proposed through Hamilton's PC12 and the Kāinga Ora submission on PC12.	1. Kāinga Ora seek the General Residential Zone provisions proposed through PC12, subject to relief sought through the Kāinga Ora submission on PC12, be applied across the Precinct. 2. Kāinga Ora accept that due to the location of the Precinct, there will be specific provisions that relate only to the Precinct that should be included in the District Plan above what is proposed for the General Residential Zone through PC12.
Chapter 3 – Structure Plans					
2.	Objectives and Policies	3.7.3.12 and 3.7.3.13e	Support	Kāinga Ora support the inclusion of objectives and policies that clearly highlight the need for development within the structure plan area, to give effect to the outcomes of Te Ture Whaimana o Te Awa o Waikato.	Retain as notified.
3.	Objectives and Policies	3.7.3.13f	Support	Kāinga Ora support the inclusion of the policy to prioritise active and public transport connections over the private motor vehicle.	Retain as notified.
4.	Rules	3.7.4.4.1 - Potable water supply	Oppose in part	Kāinga Ora oppose the reliance of the structure plan on the existing potable water supply connection and the ability for this existing network to serve up to 1250 residential lots. For consistency, the provisions of 25.13 of the District Plan should apply to the Tuumata Structure Plan area.	Amend 3.7.4.4.1 as follows: i. Prior to the operation of the Ruakura reservoir, <u>subject to the provisions of chapter 25.13</u> , up to 1250 residential lots in the Ruakura Structure Plan may be serviced from the existing Pardo Boulevard / Wairere Drive water connection. Once the Ruakura water reservoir is operational, all existing and proposed residential development within the structure plan area shall be connected to the reservoir via a new distribution network Amend 3.7.4.4.2 as follows:
5.	Rules	3.7.4.4.2 – Wastewater network	Oppose in part	Whilst Kāinga Ora support the retention and alteration of the existing rule framework relating to wastewater, provision should also be made for reference to 25.13 with regards to City Wide infrastructure provisions that should apply to the Tuumata Structure Plan area.	a. The wastewater network shall be extended along the Spine Road corridor to the full extent of the Land Development Plan Area boundary <u>and adjacent also to the Ruakura - Tuumata Structure Plan area</u>, in accordance with Figure 2-15B Ruakura Strategic Infrastructure (Appendix 2). b. The wastewater network shall discharge into the Ruakura Strategic Infrastructure wastewater network. <u>Note: Chapter 25.13 shall apply to development within the Tuumata Residential Precinct.</u>
6.	Rules	3.7.4.4.4 – Stormwater network	Oppose in part	Whilst Kāinga Ora support the management of stormwater effects arising from development, it is considered that both the existing provisions and those of PC12 within chapter 25.13 are sufficient to address this aspect of development. Moreover, relying on the provisions of chapter 25.13 ensures that the provisions associated with development within the Structure plan, are consistent with those amendments sought through PC12 particularly in how these seek to give effect to Te Ture Whaimana.	Delete rule 3.7.4.4.4 and rely upon chapter 25.13 to regulate effects of stormwater.

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General Residential Zone – 4.1.1.1 Tuumata Residential Precinct					
7.	Whole chapter	References within 4.2	Oppose in part	The specific provisions proposed to relate specifically to the Tuumata Residential Precinct are the same as those proposed to relate to the provisions proposed through private plan change 13 (Te Rapa Racecourse)	Kāinga Ora proposed changes in Proposed Plan Change 5 are shown as struck through for deletion and <u>underlined</u> for proposed additional text Amend references to ensure all current plan changes will seamlessly integrate into an Operative District Plan.
8.	Objectives and Policies	4.2.15	Oppose in part	This objective is a duplicate of objective 4.2.2.2 of PC12. In light of this objective, which is partly objective 1 of the NPS-UD, being a requirement of the HSAA, it is not considered necessary to duplicate this.	Delete objective as this will be addressed through PC12.
9.	Objectives and Policies	4.2.15a – 4.2.15d	Oppose in part	These policies are duplicates of 4.1.2.3a – 4.1.2.3d proposed through PC12. It is not considered necessary to duplicate these.	Delete policies as these will be included through PC12.
10.	Objectives and Policies	4.2.16 and policy 4.2.16a	Oppose in part	Kāinga Ora support the general direction of this objective; however, the intent of this objective and policy 4.2.16a has been addressed through objective 4.3.2.2 and policy 4.3.2.2a and 4.3.2.2c of PC12. It is not considered necessary to duplicate these	Delete objective and identified policy as these will be included through PC12.
11.	Objectives and Policies	4.2.17	Support in part	Kāinga Ora support the general direction of this objective; however, reference to the provision of amenity in accordance with the planned built environment should be included.	Amend objective 4.2.17 as follows: Residential units within the Tuumata Residential Precinct are designed and developed to create an attractive and safe urban environment, providing an appropriate level of amenity <u>that is consistent with the planned built environment</u> ; Delete policy 4.2.17b
12.	Objectives and policies	4.2.17b	Oppose	Whilst Kāinga Ora support the overall intent of this policy to deliver positive design outcomes for more comprehensive scaled developments, the policy has been written in a prescriptive manner that resembles design guidance and is an expansion of policy 4.2.17a. The more broad policy approach of 4.2.17a is sufficient to direct developments towards positive design outcomes.	
13.	Rules	4.3.3a-i	Oppose in part	Kāinga Ora support the application of the General Residential Zone as proposed through PC12, subject to the relief sought by the Kāinga Ora submission under PC12, within the Precinct. However, consider this unnecessary duplication once PC12 is made operative. There is a note included within this section that refers to the Infrastructure Capacity Overlay imposed through chapter 25.13 (Introduced through PC12).	Subject to the relief sought by the Kāinga Ora PC12 submission, rules 4.3.3a-i be removed to avoid unnecessary duplication with those provisions approved under PC12 once PC15 is incorporated within the District Plan.
14.	Performance standards	4.15.1 – Density	Support in part	Consistent with the Kāinga Ora submission under PC12, reference to the Infrastructure Capacity Overlay is opposed.	Delete note: <u>Refer to Chapter 25.13 – Three Water Infrastructure Capacity Overlay relating to density requirements</u> For clarity, consistent with the relief sought under submission point no. 5-7, general reference should be made to the provisions of chapter 25.13, within Chapter 3 of the District Plan. Residential development outside of

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				The notified Infrastructure Capacity Overlay does not include the Ruakura Structure Plan, and therefore the density controls proposed through PC12 will have no bearing on future residential development within the Tuamata Precinct and the reference is irrelevant. Standard 4.15.2 is a duplicate of 4.2.5.2 of PC12.	Kāinga Ora proposed changes in Proposed Plan Change 5 are shown as relieved for deletion and <u>undelisted</u> for proposed additional text the overlay proposed through PC12 is subject to an Infrastructure capacity assessment where a development proposes 4+ residential units.
15.	Performance standards	4.15.2 – Building Coverage	Support in part		The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions.
16.	Performance Standards	4.15.3 – Permeability and Landscaping	Oppose in part	1. Standard 4.15.3 is a duplicate of 4.2.5.3 of PC12. 2. Consistent with the relief sought on standard 4.2.5.3d of PC12, Kāinga Ora oppose the requirements for urban trees and minimum planting sizes across residential zones. The standard is not an efficient or effective method in achieving the objectives of the zone, as there will be ongoing compliance costs associated with ensuring that trees are retained post-development. The standard may also be difficult to enforce and monitor for permitted activity development where a resource consent is not required.	1. The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions. 2. Consistent with the Kāinga Ora relief sought under PC12, delete the urban trees standard and associated 'notes' as notified, and any other changes necessary to give effect to the relief sought.
17.	Performance Standards	4.15.4 – Building Height	Support in part	Standard 4.15.4 is a duplicate of 4.2.5.4 of PC12.	The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions.
18.	Performance Standards	4.15.5 – Height in relation to boundary	Support in part	Standard 4.15.5 is a duplicate of 4.2.5.5 of PC12	The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions
19.	Performance Standards	4.15.6 – Building Setbacks	Support in part	Standard 4.15.6 is a duplicate of 4.2.5.6 of PC12	The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions
20.	Performance Standards	4.15.7 – Boundary Fences and Walls	Oppose in part	Standard 4.15.7 is a duplicate of 4.2.5.7 of PC12. Consistent with the relief sought through PC12, Kāinga Ora does not support retaining walls above 3.5m as a discretionary activity being listed in the standard. This should be accounted for in the zone activity table as a non-compliance with a general standard.	The provisions should be deleted, with the General Residential provisions of PC12, subject to the relief sought by Kāinga Ora, being relied upon for the Precinct provisions.
21.	Performance Standards	4.15.8 – Public Interface	Oppose in part	1. Standard 4.15.8a is a duplicate of 4.2.5.8 of PC12. 2. Consistent with the relief sought through PC12, Kāinga Ora generally understands that development of certain typologies may need to manage effects in relation to outlook and the broader design-related issues regarding interface and engagement with the public streetscape; however, consider the public interface standard of the MDRS, as imposed through 4.2.5.8 is sufficient. 3. Consistent with the relief sought through PC12, Kāinga Ora opposes c – e as they are overly prescriptive as general development standards. There are a range of site contextual	The provisions should be deleted, with the General Residential provisions of PC12, subject to the relief sought by Kāinga Ora, being relied upon for the Precinct provisions.

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				factors that would determine whether such requirements are appropriate. These are general design principles that are better accommodated within non-statutory design guidelines (which sit outside of the District Plan) or assessment criteria. Standard 4.15.9 is a duplicate of 4.2.5.9 of PC12.	
22.	Performance Standards	4.15.9 – Outlook Space	Support in part	Standard 4.15.10 is a duplicate of 4.2.5.10 of PC12.	The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions.
23.	Performance Standards	4.15.10 – Outdoor Living Area	Support in part	Consistent with the relief sought through PC12, Kāinga Ora consider this to be assessment criteria rather than a standard, to provide for flexibility in design.	The provisions should be deleted, with the General Residential provisions of PC12 being relied upon for the Precinct provisions.
24.	Performance Standards	4.15.11 – Waste Management and Service Areas	Oppose	1. Standard 4.15.12 is a duplicate of 4.2.5.12 of PC12. 2. Consistent with the relief sought through PC12, Kāinga Ora consider this to be assessment criteria rather than a standard, to provide for flexibility in design.	Delete the standard in its entirety.
25.	Performance Standards	4.15.12 – Storage Areas	Oppose	1. Standard 4.15.13 is a duplicate of 4.2.5.13 of PC12. 2. Consistent with the relief sought through PC12, Kāinga Ora generally supports the need to manage the number of vehicle crossings and garages to public streets. Kāinga Ora does not however, support the requirement for a consent notice (which can only be imposed under a subdivision consent) under a s9 land use rule. The reference to a consent notice should therefore be deleted.	Delete the standard in its entirety, consistent with the relief sought by Kāinga Ora through PC12.
26.	Performance Standards	4.15.13 – Accessory buildings, Vehicle access and Vehicle parking	Oppose in part	3. Kāinga Ora does not support the inclusion of planting requirements associated with vehicle parking spaces on-site. This is overly onerous and the landscaping requirements for a site, as imposed through the MDRS, are sufficient. Consistent with relief sought through PC12, Kāinga Ora opposes the inclusion of Design Guides or design guidelines in the Plan, which act as de facto rules to be complied with.	1. The provisions should be deleted, with the General Residential provisions of PC12, subject to the relief sought by Kāinga Ora, being relied upon for the Precinct provisions. 2. Include the standard as-notified, subject to deletion of the 'consent notice' reference. 3. Delete standard 4.15.13.f, consistent with the relief sought by Kāinga Ora through PC12.
27.	4.11 RD – Matters of Discretion	xxii. 4 or more residential units on site C- Character and Amenity N17 – Tuamata Design and Layout. For clarity, 1.4.2 Residential Design Guide (Residential and Special Character Zones) applies	Oppose in part		Delete reference to the Residential Design Guide
Chapter Subdivision					
28.	Rules	Table 23.e	Oppose in part	The specific provisions proposed to relate specifically to subdivision within the Tuamata Residential Precinct are the same as those proposed to relate to the provisions proposed through private plan change 13 (Te Rapa Racecourse)	Amend references to ensure all current plan changes will seamlessly integrate into an Operative District Plan.

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29.	Rules	Table 23.3e	Oppose in part	The proposed rule framework for subdivision for the General Residential Zone through PC12 should be applied to the Precinct to avoid overly complicated zone provisions.	Kāinga Ora proposed changes in Proposed Plan Change 5 are shown as struckthrough for deletion and <u>underlined</u> for proposed additional text Replace proposed subdivision provisions with those proposed for the General Residential Zone of PC12, and then removed once PC12 is made operative to avoid unnecessary duplication and complication of provisions.
30.	Rules	23.3e.vi	Oppose	1. The proposed activity status of Restricted Discretionary is overly restrictive considering that unit title subdivision is around buildings and does not create vacant allotments. 2. In the absence of relief sought through submission point no. 30, consistent with the provisions proposed through PC12, this activity status should be amended to be a Controlled Activity.	1. Consistent with relief sought under submission point no. 30, replace proposed subdivision provisions with those proposed for the General Residential Zone of PC12, and then removed once PC12 is made operative to avoid unnecessary duplication and complication of provisions. 2. In the absence of the above relief, amend rule 23.3e.vi as follows: vi. Unit title Subdivision* RD± C
31.	Rules	23.3e.viii	Oppose	1. The proposed rule framework for subdivision for the Medium Density Zone through PC12 should be applied to the Precinct to avoid overly complicated zone provisions. 2. Rules a-g unnecessarily complicates the provisions. Kāinga Ora consider that a single Restricted Discretionary rule for fee simple subdivisions that create vacant allotments is sufficient to enable the appropriate assessment of standards imposed through 23.7.9, subject to the relief sought further in this submission.	1. Replace proposed subdivision provisions with the Medium Density provisions of PC12 and then be deleted once PC13 is incorporated into the District Plan. Subject to the relief sought by the Kāinga Ora PC12 submission. 2. In the absence of the above relief, amend rule 23.3e.viii as follows: viii. Fee simple subdivision* RD± C a. <u>Fee simple subdivision within the Tuamata Residential Precinct that complies with Rule 23.7.2</u> b. <u>Fee simple subdivision that creates vacant lots within the Tuamata Residential Precinct</u> c. <u>Any subdivision not in general accordance with the Ruakura-Tuamata Structure Plan Area (Figures 2-14A and 2-14B) which creates a rear lot in the Tuamata Residential Precinct</u> d. <u>Creation of any vacant lots not meeting the minimum lot size specified in Rule 23.7.1 below</u> e. <u>Creation of any vacant lots not meeting the minimum lot dimensions specified in Rule 23.7.9 below</u> f. <u>Any subdivision not meeting the block layout dimensions or minimum specified in Rule 23.7.9 below</u> g. <u>Any subdivision with access not meeting Rule 23.7.9 below</u>

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					8. Any subdivision to create road to vest that does not meet the minimum widths in 23.7.9		
32.	Standards	23.7.1aa.	Oppose	Kāinga Ora opposes the inclusion of a minimum net site area, and requests that a minimum shape factor be relied upon instead for subdivision within the Tuamata Residential Precinct. This would sufficiently ensure that smaller vacant lot sizes are not created which might otherwise foreclose multiunit redevelopment of a single site, in accordance with the MDRS and the enabling provisions of the zone.	Replace reference to a minimum net site area with a shape factor. Consistent with the Kāinga Ora submission on PC12, the following is recommended: Vacant lot subdivision: Accommodate a rectangle of 8m x 15m		
Chapter 1.1 - Definitions and Terms							
33.		Tuamata residential terrace dwelling and Tuamata residential apartment dwelling	Oppose	The proposed definitions are duplicates of the definitions proposed for 'terrace housing' and 'apartment building' through PC12. It is not necessary to duplicate the definition to accommodate typologies within the Tuamata Precinct.	Delete definitions.		
Chapter 1.3 – Assessment Criteria							
34.	Assessment criteria	N15h.	Oppose	Kāinga Ora oppose the inclusion of assessment criteria that reference the avoidance of the creation of rear lots. The avoidance of rear lots may result in the under-development of the residential precinct rather than encouraging comprehensive residential development in accordance with the MDRS.	Delete assessment criteria N15h.		
35.		N17	Oppose in part	Whilst Kāinga Ora generally supports the proposed amendments to Appendix 1.3 and the additional assessment criteria, the inclusion of assessment criteria that is comparable to a design guide is opposed. Assessment criteria of N17 should be retained only so far as high level urban design principles, such as that detailed through the explanatory text.	Delete assessment criteria N17a-l and amend the assessment criteria as follows: <table><tr><td>N17</td><td><u>Tuamata Design and Layout</u> <i>Explanation</i> Assessment criteria are a tool to help ensure good quality outcomes are achieved – they describe key urban design elements that should be examined through the design process. In terms of design and layout, the elements are: 2. Context – has the proposal considered the surrounding context including adjacent properties? 3. Public Realm – has the proposal considered the adjacent public environment (including streets, open spaces)? 4. Site Layout – does the proposal ensure good privacy and CPTED outcomes for residents and a clear hierarchy of space? 5. Access – has safe circulation to and through the site been provided for all modes including pedestrians? 6. External Appearance – does the external design and architectural detailing incorporate methods to reduce the overall bulk and scale and avoid large blank, unrelieved walls?</td></tr></table>	N17	<u>Tuamata Design and Layout</u> <i>Explanation</i> Assessment criteria are a tool to help ensure good quality outcomes are achieved – they describe key urban design elements that should be examined through the design process. In terms of design and layout, the elements are: 2. Context – has the proposal considered the surrounding context including adjacent properties? 3. Public Realm – has the proposal considered the adjacent public environment (including streets, open spaces)? 4. Site Layout – does the proposal ensure good privacy and CPTED outcomes for residents and a clear hierarchy of space? 5. Access – has safe circulation to and through the site been provided for all modes including pedestrians? 6. External Appearance – does the external design and architectural detailing incorporate methods to reduce the overall bulk and scale and avoid large blank, unrelieved walls?
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