

To: Kasey Zhai – Baker & Associates Limited

From: Katherine Hu and Frank Pierard – Baker & Associates Limited

Date: 1 December 2023

Re: 167 – 179 Pilkington Road Point England - Urban Design Cl.23 Further Information Request

1.0 Purpose and Scope

This memorandum responds to the urban design matters raised within Item UD1 – UD2 of Clause 23 Request for Further Information (dated 9 October 2023) and the Non-Cl. 23 Urban Design comments pertaining to the Private Plan Change Request ('PPC') for the rezoning, height variation controls ('HVC') and introduction of new precinct provisions at 167 -179 Pilkington Road, Point England.

We note that the response to Item UD 3 Residential amenity outcomes will be provided as part of the overall Clause 23 Response Letter.

Our involvement in the project to date has been limited to offering urban design advice and preparing the Urban Design Assessment and corresponding 3D modelling for the PPC.

The following response is based on the following information:

- Our most recent and best understanding of the site and wider area (including a desk-top review of GIS information and aerial photographs of the site and wider area);
- A review of the lodgement version of the PPC and Urban Design Assessment, both prepared by Bakers & Associates; and
- A review of the relevant objectives, policies and assessment criteria of the Business – Mixed Use Zone within the AUP.

2.0 Response to Urban Design Matters

2.1 UD 1 Comprehensive development

Section 2.2 of the Urban Design Assessment confirms that ‘any future development would be subject to a comprehensive design process’. Please clarify what is meant specifically by ‘subject to a comprehensive design process’ and how a comprehensive design for this site would be processed.

This is a significant, highly accessible brownfield site under single ownership. Future redevelopment of this site needs to be carried out in a co-ordinated manner to avoid piecemeal / ad-hoc redevelopment without consideration of the bigger picture.

Successful large-scale brownfield urban redevelopments are often guided by comprehensive approaches such as master planning or establishing strategic outcomes for the site. Local examples of this are TRC, Stonefields and Te Tauoma. Yet it is understood that this proposal relies on the provisions of the draft precinct and the underlying BMU zoning to deliver outcomes.

As noted within the lodged Urban Design Assessment, the site’s proximity to Glen Innes Station along with its good access to a range of services and amenities (such as those in the Glen Innes Town Centre), make it well suited for more intense and varied uses. The existing MUZ provisions under the AUP, including objectives¹, policies² and the list of activities³, all help to achieve and deliver this outcome. These provisions form an existing mechanism which is widely used in Auckland’s MUZ for both greenfield and brownfield developments.

New buildings within the MUZ have restricted discretionary activity status which requires Council to assess the proposal against a range of assessment criteria to ensure they are of a high standard and make a positive contribution to the safety and quality of streets and public open spaces. Council officers also have the ability to seek expert independent design review advice from the Auckland Urban Design Panel (‘AUDP’) should they consider any future development to be of a scale or significance that would merit this additional review process.

In terms of providing a comprehensive design approach to avoid ad-hoc redevelopment, we agree this is important considering the size and strategic location of the site. There is also a requirement to maintain a degree of flexibility for future site-specific outcomes due to changing market demands and requirements. As such, amendments have been proposed to the objectives and policies associated with the Pilkington Park Precinct Provisions to promote a more comprehensive and coordinated approach in the future (text in bold represents the amendments):

- Objectives IX.2(1): The Pilkington Park Precinct is **comprehensively** developed as a high-quality mixed-use centre which is well-designed and integrated within the surrounding area.
- Policy IX.3(3): **Promote the comprehensive development and redevelopment of the Pilkington Park Precinct.**

¹ Objectives H13.2 (1), (6) and (8);

² Policies H13.3 (2), (17), (18) and (20);

³ Activity Table H13.4.1;

Clause 23 letter also made reference to Section 2.2. of the Urban Design Assessment, which originally stated that:

The model has been developed with the following limitations and assumptions:

- *The diagrams represent a ‘maximum build-out’ and does not represent a likely built form scenario. Any future development would be subject to a comprehensive design process.*

By way of clarification, this has now been revised as follows:

The model has been developed with the following limitations and assumptions:

- *The diagrams represent a ‘maximum build-out’ and does not represent a likely built form scenario. Any future development for new buildings including additions to existing buildings and accessory buildings, would be designed accordingly at that time and will be subject to a resource consent process with the consideration of several design matters ~~subject to a comprehensive design process.~~*

2.2 UD 2 Streetscape outcomes

Please provide information on how future development will ensure positive streetscape outcomes from a CPTED point of view, to encourage walkability to and from the site.

The streetscape environment along Apirana Avenue / Pilkington Road towards the town centre is compromised in terms of pedestrian safety (CPTED) and amenity. The open space zoned land (comprising 84% of the site’s frontage along the eastern boundary contains well-established specimen trees / vegetation) making visibility into the site from the street very difficult and, creating a large setback the street edge.

The site is highly accessible. It is located within the proposed walkable catchment of the Glen Innes town centre and train station. An increase in pedestrian traffic associated with future development in a BMU zone is likely, and this raises the need for information on how CPTED matters, will be addressed to encourage walkability to and from the site.

The existing ‘open space’ zoned land to the east which contains existing mature vegetation is not within the applicant’s ownership and is outside of the Plan Change Area. Any future changes, including ongoing maintenance or removal of such vegetation, is outside of the applicant’s control and would be subject to future discussions with the asset owner. This is an existing scenario which has been considered in detail throughout the preparation of this application.

The existing MUZ already contains specific matters of discretion pertaining to new buildings which seek to enhance the CPTED qualities associated with ‘public spaces’ which include both the streetscape and adjoining open space zoned land to the east.

- (H13.8.1(3.e)) - The application of Crime Prevention through Environmental Design principles to the design and layout of buildings adjoining public spaces.

Other matters of discretion within the MUZ for new buildings pertaining to CPTED outcomes include the following:

- (H13.8.1(3.a.ii)) – The design and appearance of buildings in so far as it affects the existing and future amenity values of public streets and spaces used by significant numbers of people. This

- includes: The maintenance or enhancement of amenity for pedestrians using the public space or street.
- H13.8.1(3.c) – The extent of glazing provided on walls fronting public streets and public spaces and the benefits it provides in terms of:
 - (i) The attractiveness and pleasantness of the public space and the amenity for people using or passing through that space;
 - (ii) The degree of visibility that it provides between the public space and the building interior; and
 - (iii) The opportunities for passive surveillance of the street from the ground floor of buildings.

In our view, these provisions will assist in promoting social interactions, visual connections between buildings and surrounding public spaces, passive surveillance, and a general uplift in the sense of safety achieved within the adjoining public realm.

3.0 Non-Clause 23 comments – Urban Design

Other urban design comments were included in the Clause 23 letter, and whilst they are not Clause 23(1) request matters, I have paraphrased the key concerns/elements as below:

- Concerns that future development will not be provided in an integrated manner;
- Concerns that the BMU zone and proposed precinct provisions do not provide enough strategic planning direction and good design outcomes; and
- Concerns that a reliance on the AUP and resource consent process will not result in good urban design outcomes.

In response to the above matters, I note the following:

- The AUP already uses the current MUZ restricted discretionary matters of discretion and assessment criteria for new buildings and alterations and additions to buildings of up to 27m to manage the design quality of brownfield developments within this zone.
- From an urban design perspective, the change of zoning enables Council the ability to assess new buildings against several design-based matters, in particular:
 - The design and appearance of buildings, including with specific regard to the visual quality and interest of streets and other public open spaces (H13.8.1 (3)(a));
 - The extent of glazing treatment provided with specific regard to passive surveillance over public streets and spaces (H13.8.1 (3)(c));
 - The application of Crime Prevention through Environmental Design principles to the design and layout of buildings adjoining public spaces (H13.8.1 (3)(e));
 - The effects of creation of new roads and/or service lanes on the matters listed above (H13.8.1. (3)(f)); and
 - The positive effects that landscaping, including required landscaping, on sites adjoining public spaces is able to contribute to the amenity values of the people using or passing through the public space (H13.8.1 (3)(g)).

- The ability to be assessed under the same design considerations and provisions is consistent with the adjoining properties to the south.
- Through the introduction of the additional precinct provisions, any future development of new buildings, including additions to existing buildings and accessory buildings will be required for resource consent and be assessed against specified urban design matters, in addition to assessment criteria set out in H13 Business – Mixed Use Zone.

4.0 Conclusion

The subject site is located in close proximity to the Glen Innes Town Centre and has good access to a range of transport options, amenities and community facilities. The site is surrounded by a range of land uses including commercial, mixed use, light industrial, residential and recreational. The strategic location along with the other site characteristics previously described provides an opportunity for the establishment of a mixed-use environment which could contribute to the vibrancy of the Glen Innes Town Centre.

The proposed precinct provisions in combination with the existing AUP provisions will help to secure good design, safety and amenity outcomes within the site and ensure the land is developed and used efficiently and in a coordinated manner.