

BEFORE THE SELWYN DISTRICT COUNCIL HEARING PANEL

IN THE MATTER of the Resource Management Act
1991

AND

IN THE MATTER of the DISTRICT PLAN REVIEW

**STATEMENT OF EVIDENCE OF GABI WOLFER
ON BEHALF OF SELWYN DISTRICT COUNCIL**

COMMERCIAL AND MIXED USE ZONES

11/11/2021

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1. INTRODUCTION

- 1.1** My full name is Gabriele Tanja Wolfer. I have been working for Selwyn District Council as their Urban Designer/Town Planner for the past 10 years. I am a senior member of the Policy and Strategy team.
- 1.2** I hold a Master's degree in Urban and Spatial planning from the Technical University Kaiserslautern, Germany which I gained in 2004. I am an Associate member of the New Zealand Planning Institute (NZPI) and a member of the Architectural Institute Rhineland-Palatinate, Germany.
- 1.3** I have been asked to give evidence on submission points within the commercial and mixed use development chapter as part of the Proposed Selwyn District Plan (PSDP) review.
- 1.4** The key documents I have used, or referred to, in forming my view while preparing this brief of evidence are:
- (a) Section 32 report – Commercial and Mixed Use, Date, 2010
 - (b) Background report: Urban Design Best Practise, September 2017
 - (c) Background report: Business Interface, July 2017
 - (d) UD principles of the NZ Design protocol 2005, CPRS 2013, Policy 6.3.2 July 2017 (Appendix 2)
 - (e) CPTED principles, Council policy C602, 2005 (Appendix 3).

2. SCOPE

The specific part of the PSDP that my evidence relates to are Urban Design Matters within the commercial and mixed use zones chapter raised by submitters. I will specifically address:

- (a) the purpose and role of active frontage in Selwyn's commercial and mixed use zones;
- (b) the location of car parking in context of site layout in Selwyn's commercial and mixed use zones;
- (c) submissions received in regards to a) and b)

3. EXECUTIVE SUMMARY – the conclusions of my review

The received submissions relate to 'active frontage' and 'location of car parking' within the Proposed Selwyn District Plan's (PSDP's) Town Centre, Local Centre and Neighbourhood Centre Zones.

The provisions of active frontage and the location of car parking are important components of best practise town centre site design including meeting Canterbury Regional Policy Statement (CRPS) Policy

6.2 and national Crime Prevention Through Environmental Design (CPTED) guidelines, which Selwyn District Council (SDC) has adopted as Policy 602.

Submissions on 'Active Frontage'

The submissions received requested to a) exempt existing development and b) to exempt supermarkets from the requirements for active frontage within the various Commercial and Mixed Use Zones (CMUZ) of the PSDP.

I have outlined in my evidence under section 7, 8 and 9 the amenity and safety benefits that stem from applying active frontage to new and existing buildings within areas where pedestrians are present.

3.1 I agree with parts of the submission of JPSingh¹ and consider for consistency an amendment which reflects a different approach to providing active frontage depending on the type of development.

3.2 I recommend to make changes to TCZ-REQ8, LCZREQ7, NCZ-REQ6 and amend points 1, 2 and 3 as follows:

3.3 *1. Any new commercial building:*

For any new commercial building the primary frontage² must contain at least 50% active frontage at ground floor level. The secondary frontage³ must contain at least 10% active frontage at ground floor level.

3.4 *2. Any existing commercial building:*

For any structural modification to an existing commercial building the primary frontage⁴ must contain either at least 50% active frontage at ground floor level or retain the existing active frontage, whichever the greater.

3.5 *3. Any existing residential development to be converted for commercial use:*

Any façade that overlooks public space or 'on-site public space'⁵ must retain at least 80% of existing glazing at Ground Floor level.

3.6 I consider given the size and subsequent length of frontages expected from supermarkets, the effects on and along public space within the town, local and neighbourhood centres would be substantial if no active frontage is provided.

¹

^{2 3 4 5} Appendix 1

- 3.7** I disagree with submitters Investore Property Ltd., Foodstuffs South Island Ltd& Foodstuffs (SI) Properties Ltd.⁶ and their submissions and consider REQ8 to remain applicable to all activities within the respective CMUZ zone.
- 3.8** **I therefore recommend to decline the submitters' request to exempt supermarkets from TCZ-REQ8 and LCZ-REQ7.**
- 3.9** In regards to submitter's Foodstuffs South Island Ltd& Foodstuffs (SI) Properties Ltd.⁷ request alternatively change the compliance status to restricted discretionary I have considered this suggestion, but conclude that a restricted discretionary status is not sufficient to address context and individual circumstances adequately, given the impact on safety and amenity in Selwyn's centres, if no active frontage would be provided.
- 3.10** I do refer to point 3.2 of my summary where I recommend a different approach to providing active frontage, depending on the type of development proposed.
- 3.11** I consider this approach to be applicable to the town and local centres in Selwyn District respectively.
- 3.12** **I recommend to decline the submitter's request to amend the rule framework from non-complying to restricted discretionary.**
- 3.13** I disagree with submitter Foster Commercials⁸ to exempt supermarkets from active frontage requirements.
- 3.14** I consider that the integration of active frontage within supermarket designs in NHZ is an appropriate method to meet the expected outcome of creating an attractive environment that is compatible and complementary within, in the case of Neighbourhood Centres, its residential surroundings.
- 3.15** **For above reasons I recommend to decline the submitter's⁹ request to decline the submitter's requests to delete NCZ-REQ6.**

Submissions on 'Location of Car Parking'

The location of car parking is part of the overall site layout. It is interlinked with building placement and achieving an active frontage. Best practise site layout determines a clear 'public front' and 'private back' to create an attractive and safe street scene.

The submissions received requested to a) delete rule requirements for location of car parking in NCZ and b) to exempt supermarkets from the requirements for location of car parking within the TCZ.

⁶ DPR-0323.008, DPR-0373.012 and DPR-0373.026

⁷ DPR-0373.012

⁸ DPR-0126.010

- 3.16** I agree with the submitters Foster Commercial ¹⁰ that although the site layout is an exemplar for placing car parking to the rear of a site and be in keeping with the intentions of NCZ-REQ7; the commercial development 'South Point' technically is a non-complying activity.
- 3.17** The context of this development is quite unique as the site is surrounded on all four sides by public road, which is why placement of car parking has to come subsidiary to placement of built form.
- 3.18** I recommend to amend NCZ-REQ7 to be clearer in its intention and avoid a potential non-compliance as raised by the submitter.
- 3.19** **For the reasons above I recommend to decline the submitter's¹¹ requests to delete NCZ-REQ7, and recommend to make changes to NCZ-REQ7 and point 1 as follows:**
- 3.20** ***1. No car parking or vehicular access is provided between the primary frontage of any building and a legal road (or any accessway from which the public will access the site if it does not have access to a legal road), except where the building has more than two frontages, in which case the developer may nominate which façade is the primary one.***
- 3.21** In response to submitter Investore Property Ltd.¹² request to exempt supermarkets from the provisions of TCZ-REQ9 due to operational requirements and a high number of customers using vehicles when going shopping. As outlined in my evidence and in Appendix 4 there are numerous examples of where supermarkets have incorporated operational matters into their site design layout while having provided car parking to the rear or the side of the site.
- 3.22** I consider it appropriate to stipulate the requirement for location of car parking to retain a high level of amenity and safety at any time as a primary function and subsequent secondary beneficiary outcomes, such as active frontage within a town centre environment.
- 3.23** **I therefore recommend to decline the submitter's requests to amend TCZ-REQ9.1 and exempt supermarkets.**
- 3.24** In regards to the submitters Foodstuffs South Island Ltd.& Foodstuffs(SI) properties Ltd.¹³ request to change the compliance status to restricted discretionary I have considered potential assessment matters, such as size of car park and frontage length, as well as amenity measures that could become part of an assessment. However, given that REQ9.1 provides two options for car park placement I consider the current provisions appropriate to address any possible site constraints, while achieving the fundamental underlying objectives of a best practice site layout in a Town Centre and Local Centre environment.
- 3.25** **I therefore recommend to decline above submission for changing the compliance status from non-complying to restricted discretionary.**

¹⁰ DPR-0126.011

¹¹ DPR-0126.011

¹² DPR-0323.010

¹³ DPR-0373.013

4. CONTEXT OF REVIEW

All reviewed submissions and further submission request change to the current provisions within either the Town Centre Zone, the Local Centre Zone or the Neighbourhood Zone, which are part of the PSDP's the Commercial and Mixed Use Zone (COMUZ).

The PSDP expects developments within these zones 'to be attractive, meet the principles of good urban design and be compatible with its residential surroundings.'

Within this review I have addressed the following questions:

- What is the location of the proposal and what is the expected character and amenity in the respective zone?
- What is the function of active frontage and are there potential benefits from the request?
- What is the function of determining the location of car parking and are there potential benefits from the request?
- What is the interconnection between active frontage and location of car parking?
- How is the overall site layout affected by the placement of car parking and what are the subsequent effects in terms of achieving active frontage?
- What would the outcome look like if no active frontage is provided?
- What would the outcome look like if no direction would be given in terms of location of car parking?
- What are the zone specific effects on the receiving environment, including safety (CPTED), amenity and visual effects, particularly pedestrian experience, pedestrian environment, look/feel/ character?
- What is considered as best practise? What examples are in the community that provide good outcomes?
- How do other comparable Districts provide for active frontage or location of car parking?

5. SUMMARY OF SUBMISSIONS

Council has received 5 submission points relating to 'active frontage', all of which are opposed to the proposed Selwyn District Plan provisions. Council has also received a further submissions in regards to above submissions made.

Council has received 3 submission points relating to 'car parking location', all of which are opposed to the proposed Selwyn District Plan provisions.

6. SUBMISSIONS IN REGARDS TO 'ACTIVE FRONTAGE'

I have reviewed the following submissions points:

- DPR-0204 SP 047- JP Singh
- DPR-0323 SP 008- Investore Property Ltd.

- DPR 0373 SP 012- Foodstuffs South Island Ltd & Foodstuffs (SI) Properties Ltd.
- DPR-0373 SP 026- Foodstuffs South Island Ltd & Foodstuffs (SI) Properties Ltd.
- DPR-0126 SP 010- Foster Commercial

I have reviewed the following further submissions point:

- DPR-0032 FSUB E1 – Christchurch City Council

7. SUBMISSION ON EXISTING DEVELOPMENTS

- 7.1** The submission made by submitter JP Singh¹⁴ relates to existing developments in the TCZ. The request seeks to have REQ8 points 2. and 3. to be deleted. Point 2 ensures that where a façade overlooks on site public space... 80% of existing transparent glazing to be retained as active frontage. Point 3 confirms that transparent glazing may not be obscured or covered.
- 7.2** The submitter argues that TCZ-RE Q8 is overly restrictive and is not consistent with the requirements for new development. The submitter also considers that the cost of obtaining a resource consent to remove or obscure a window are to outweigh positive aspects, particularly if not directly facing (public) roads.
- 7.3** I have sympathy with the submitter's first argument and agree that the rule requirement using different percentages within TCZ-REQ8, depending if applied to a new or existing development might appear on first glance unjust.
- 7.4** To clarify the intent of the requirement is to achieve active frontage in areas that are situated within or adjacent public space, regardless of the façade being part of an existing or a new building. Active frontage can only achieved if glazing within openings is transparent, unobstructed and free of advertisement.
- 7.5** However, the way and the degree in/to which this gets achieved needs to take into account if the proposal is a new building that can easily incorporate active frontage as part of the overall design, or in the case of a building being converted/structurally amended, if there is an existing amount of glazing that can be retained as part of a conversion.
- 7.6** In the case of converting a residential unit into a commercial business, the best possible outcome is to retain the existing glazing as is to achieve passive surveillance and interface, even if it is at a lower level than for a new build.
- 7.7** In the case of making some structural changes to an existing commercial building, the best outcome is to request for the amendments to retain the current provision of active frontage within the primary façade and design accordingly.

¹⁴ DPR-0204.047

- 7.8** To improve consistency within the rule and to take regard of the three different scenarios as outlined above I agree with the submitter in parts and suggest to this effect the TCZ-REQ8 to be amended as follows:
- 7.9** ***1. Any new commercial building:***
- For any new commercial building the primary frontage¹⁵ must contain at least 50% active frontage at ground floor level. The secondary frontage¹⁶ must contain at least 10% active frontage at ground floor level.***
- 7.10** ***2. Any existing commercial building:***
- For any structural modification to an existing commercial building the primary frontage¹⁷ must contain either at least 50% active frontage at ground floor level or retain the existing active frontage, whichever the greater.***
- 7.11** ***3. Any existing residential development to be converted for commercial use:***
- Any façade that overlooks public space or ‘on-site public space’¹⁸ must retain at least 80% of existing glazing at Ground Floor level.***
- 7.12** In the context of retro-fitting an existing residential unit to a commercial business I agree with the submitter’s comments on a financial aspects, which is why alternative approach has been proposed (point 7.11) above.
- 7.13** In terms of the submissions reference to where windows do not directly face roads. Best practice urban design confirms that ‘active frontage’ as a design principle is an important component of town centres in Selwyn , which likewise needs to apply to public space and ‘de-facto’ public space to achieve the intended outcomes of creating a safe and attractive urban environment.
- 7.14** The PDP defines ‘on-site public space’ as de-facto public space occurring on private sites (Appendix 2). This includes car parking areas, squares and areas where pedestrians are present.
- 7.15** Achieving a sufficient level of transparency within proposed building facades and retaining the proposed level of transparent glazing within existing building facades is important and has amenity, legibility, as well as safety benefits.

^{15 3 4 5} Appendix 1

- 7.16** Providing unobstructed transparency for at least half of the overall façade at ground/ eye level supports passive surveillance and increases perceived safety to pedestrians. Having regular openings within a façade provides for visual variety, creates interest and breaks up the length of a building when walking along it. Corner windows allow pedestrians to see through windows before turning.
- 7.17** By creating a safe and pedestrian friendly environment that allows having the ability for passive surveillance, the Council meets its obligation as a signatory to the NZ Design Protocol to follow best practice Urban Design and meet national CPTED principles 1 (Surveillance) and 4 (Quality environments) in particular, which have been adopted as Council policy C602(Appendix 2).
- 7.18** If the requirement for active frontage within existing development would be deleted as requested and only applied to new development, the potential outcome could be either a blank wall with no glazing/openings or glazing's/openings covered with advertisement (as seen in Rolleston TC- Hollys Dairy), neither of which would be an acceptable outcome in an urban environment where public is present.
- 7.19** Along the public /private interface this could have not only have an impact on the visual amenity of the individual building, but could affect the overall character of the town centre zone along highly frequented pedestrian routes.
- 7.20** Removing any requirement of active frontage along facades also affects the perceived safety of an area, with the lack of ability to provide or receive passive surveillance.
- 7.21** I confirm that in the town center context the requirement for active frontage to be retained, but amended as per 7.9-11 to achieve a high level of (perceived) safety and amenity in the case of new, existing and modified built form.
- 7.22** Recommendation to make changes to TCZ-REQ8 points 1, 2 and 3.
- 7.23** Recommendation to make changes to LCZ-REQ7 points 1, 2 and 3.
- 7.24** Recommendation to make changes to NCZ-REQ6 points 1, 2 and 3.

8. SUBMISSIONS TO EXEMPT SUPERMARKETS FROM ACTIVE FRONTAGE REQUIREMENTS

- 8.1** The submissions of submitter Investore Property Ltd.¹⁹ and submitter Foodstuffs South Island Ltd. & Foodstuffs (SI) Properties Ltd.²⁰ relate to new and existing developments in the TCZ and LCZ.
- 8.2** The request seek to have 'supermarkets' to be exempt from REQ8 points 1. & 2. and LCZ-REQ7 points 1. & 2.
- 8.3** Submitter Foodstuffs South Island Ltd. & Foodstuffs (SI) Properties Ltd. alternatively seeks relieve in the way to amend the rule framework from a non-complying to restricted discretionary status.
- 8.4** Amenity and safety benefits of active frontage within an urban environment have been discussed in my evidence previously and are particularly important within a town and local centre context and their respective roles for the community.
- 8.5** Centres should be designed as attractive urban spaces where built form contributes to create a distinct character and addresses public space, such as footpaths, laneways and squares.
- 8.6** Development within TCZ and LCZ should be designed to: a) enhance and activate public spaces with high quality ground floor facades at eye level, b) encourage and facilitate a high quality pedestrian environment with vertical façade expressions and c) to create enjoyable experiences at any time of the day. Granular patterns should be used to avoid large blank facades or monotonous buildings.
- 8.7** I appreciate that supermarkets have operational matters that are unique to them, but consider this a matter that can be addressed within appropriate design. Supermarkets in the context of a Town or Local Centre need to visually be able to integrate with their surrounds and examples in NZ have demonstrated how this can be achieved successfully.
- 8.8** I consider the same outcomes from the application of active frontage anticipated for other trade activities to apply to supermarkets and refer to the following examples where this has been achieved (see Appendix 4):
- Pak'n'Save RC 185641 , Rolleston Drive, Rolleston,
 - Pak'n'Save Queenstown
 - New World, Durham Street, Christchurch

¹⁹ DPR-0323.008

²⁰ DPR-0373.012 and DPR-0373.026

- 8.9** I consider that the amended rule framework, as suggested in point 7.9 provides the intended outcome in the case of retro-fitting a supermarket to another trade activity.
- 8.10** As previously outlined retaining the existing level of glazing and level of transparent glazing is important to establish a safe, pedestrian friendly environment, to have the ability to have passive surveillance, meet CPTED rules as in eyes on the street to deter crime, be in compliance with signage and achieve the intended character for the town centre.
- 8.11** This requirement is important to retain a high level of safety and amenity at any time, regardless if a building gets used as a supermarket or any other anticipated activity within a TCZ.
- 8.12** If the requirement of an active frontage would exempt supermarkets the potential outcome could be extended length of blank walls with no glazing/openings along public space and where high volume of public is present, which would have an impact on the visual amenity of the building itself and the overall character of the town (visual impact).
- 8.13** Having no openings would result in lack of ground floor activation at eye level in areas of high pedestrian activity and would result in lack of ability to provide passive surveillance to and from public space (safety impact).
- 8.14** I consider given the size and subsequent length of frontages expected from supermarkets, the effects on and along public space within the Town, Local and neighbourhood centres would be substantial.
- 8.15** **Recommendation to decline the submitters request to exempt supermarkets from TCZ-REQ8.1 and 8.2 and LCZ-REQ7.1 and 7.2.**
- 8.16** In regards to the submitters request to alternatively change the compliance status from non-complying to restricted discretionary I have considered this suggestion, but conclude that a restricted discretionary status is not sufficient to address context and individual circumstances adequately, given the impacts on safety and amenity in Selwyn's centres.
- 8.17** Should compliance with the active frontage rule not be met an application for resource consent where all matters and potential effects can be considered is the appropriate measure. This is a position that is supported by Christchurch City Council²¹ in a further submission supporting to retain the existing proposed provisions for supermarkets.
- 8.18** **Recommendation to decline the submitter's requests to change the activity status for supermarkets in the TCZ and LCZ.**

²¹ DPR-0032 FSub E1

9. SUBMISSION TO DELETE ACTIVE FRONTAGE REQUIREMENTS WITHIN NCZ

- 9.1** Submitter Foster Commercial's ²² submission relates to new and existing developments in the NCZ. The submitter seeks to delete NCZ-REQ6, which requires providing active frontage in a Neighbourhood Zone.
- 9.2** The Neighbourhood Zone is predominantly located within a residential area, characterized by one-storey building typologies and residential features and which naturally has a high level of amenity that needs to be considered.
- 9.3** I consider that the integration of active frontage within supermarket designs in NHZ is an appropriate outcome to meet the expected outcome of creating an attractive environment that is compatible and complementary within its residential surroundings.
- 9.4** The submitter states that the requirements of NCZ REQ6 are unnecessary and overly complicated and that it is unnecessary to prohibit singe of frontage windows...as a common form of advertising.
- 9.5** In response to the first part of the submission I refer to my previous discussion on the role and benefits of active frontage in the context of urban areas and in locations where pedestrians are present.
- 9.6** I concur with the submitter in the aspect of creating a simpler more direct wording for NCZ-REQ6. I consider having different requirements for existing and new development are appropriate to address the requirement of active frontage in context and recommend an amended wording as per 7.9 and 7.10 to apply to the NCZ context also.
- 9.7** In regards to the submitter's comments in terms of necessity and signage being a common form within windows. I agree that windows have been used to display advertisement, which has contributed to causing issues in terms of safety and amenity in Selwyn's town centres. Signage is an integral part of the (commercial) design and needs to be provided alongside active frontage and façade treatments.
- 9.8** **Recommendation to decline the submitter's requests to delete NCZ-REQ6.**

10. SUBMISSIONS IN REGARDS TO 'LOCATION OF CAR PARKING (LOCP)'

I have reviewed the following submissions points:

- DPR-0126 SP 011- Foster Commercial
- DPR-0323 SP 010- Investore Property Ltd.

²² DPR-0126.010

- DPR-0373 SP 013- Foodstuffs South Island Ltd & Foodstuffs (SI) Properties Ltd.

11. SUBMISSION TO DELETE LOCP REQUIREMENTS IN NCZ

- 11.1 Submitter Foster Commercial²³ seeks to delete rule requirement NCZ- REQ7, which requires the provision of car parking to the rear or the back of buildings.
- 11.2 The submitter states that the rule would prevent any car parking on the South Point site. The submission further elaborates that parking at the rear would create numerous safety, access, servicing and circulation issues.
- 11.3 In response to the first part of the submission. I agree with the submitters Foster Commercial ²⁴ that the commercial development 'South Point' is technically a non-complying activity.
- 11.4 However it has to be noted that this development is quite unique as the site is surrounded on all four sides by public road, which is why placement of car parking has to come subsidiary to placement of built form. Built form has been placed accordingly to that principle along the road boundary with Faringdon Boulevard as the higher ranked road in the SDP's roading hierarchy and hence has been designed as the 'front' of house. The development of the car park and service areas have subsequently been placed to the back and the side of the building respectively.
- 11.5 The location of car parking is part of the overall site layout. It is interlinked with building placement and achieving an active frontage. Best practise site layout determines a clear 'public front' and 'private back' to create an attractive and safe street scene. Removing the requirement does have implications for the overall site layout and subsequent amenity and safety effects as further elaborated on in 12.3.
- 11.6 To address the submitters concerns I recommend to amend NCZ-REQ7 to be clearer in its intention and avoid a potential non-compliance as raised by the submitter.
- 11.7 I recommend to amend NCZ-REQ7.1 as follows:
- 11.8 ***No car parking or vehicular access is provided between the primary frontage of any building and a legal road (or any accessway from which the public will access the site if it does not have access to a legal road), except where the building has more than two frontages, in which case the developer may nominate which façade is the primary one.***
- 11.9 In terms of the submitters concerns in terms of safety, access and circulation issues. I consider the layout of South Point a successful example, which provides a clear front and back of house, legible pedestrian routes within the site and opportunities for services and waste management.

²³ DPR-0126.011

²⁴ DPR-0126.011

11.10 Recommendation to decline the submitter's requests to delete NCZ-REQ7.

12. SUBMISSIONS TO EXEMPT LOCATION OF CAR PARKING REQUIREMENTS IN TCZ FOR SUPERMARKETS

- 12.1** Submitters Investore Property Ltd. And Foodstuffs South Island Ltd& Foodstuffs (SI) Properties Ltd.²⁵ request to amend rule requirement TCZ- REQ9.1 and exempt supermarkets from the provision.
- 12.2** Foodstuffs South Island Ltd& Foodstuffs (SI) Properties Ltd. alternatively seeks relieve in the way to amend the rule framework of TCZ-REQ9.1 from a non-complying to a restricted discretionary status.
- 12.3** The location of car parking is part of the overall site layout. It is interlinked with building placement and achieving an active frontage. Best practise site layout determines a clear 'public front' and 'private back' to meet CPTED principles and create an attractive and safe street scene.
- 12.4** Policy B3.4.24 (a) states that a layout needs to have buildings designed to bring interest and activity to streets and that developments which turn their back on the street will undermine the opportunity for a community hub to be developed.
- 12.5** Council has adopted in 2011 a design guide for Commercial development, which states that car parking "although important, it must not dominant town centres"... and placement of carparking as a design matter and layout and position (placement) to be carefully considered as par to the site design at the earliest stage.
- 12.6** I consider the built form of supermarkets to be part of the built form within a town centre. To place the development along the road boundary and parking behind or the side provides numerous amenity and safety benefits, such as a) contributing to an attractive street scene and b) achieving a high quality public space and allowing architecture to actively contribute to the amenity value of the zone.
- 12.7** The submitters states that the requirement for car parking to be placed to the side or the rear to be inconsistent with the operational matters of the supermarket. The submitter further states that a significant percentage of customers need to use a car when visiting a supermarket.
- 12.8** I agree with the submitter that when designing for supermarkets that the site layout needs to incorporate activity specific operational matters. These operational matters are

²⁵ DPR-0323.010 and DPR-0373.013

important, but not insurmountable to successfully be addressed within a site, as successfully demonstrated. I refer to my discussion above and Appendix 4- Best practice examples, which demonstrates that operational matters can be addressed within the design while meeting the requirement of TCZ-REQ9.1.

- 12.9** I agree with the submitter that a large percentage of customers will arrive via car and require nearby car parking, which is why TCZ REQ 9.1 does encourage car parking to be provided as part of a site layout that is complementary to the location of the activity - either to the back or the rear.
- 12.10** The location of car parking to the rear or side of a building is addressed and listed as an expected environmental result for the B1 zones in the Waimakariri District Plan also.
- 12.11** I consider it appropriate to stipulate the requirement for location of car parking to retain a high level of amenity and safety at any time as a primary function and subsequent secondary beneficiary outcomes, such as active frontage within a town centre environment.
- 12.12** **Recommendation to decline the submitter's requests to amend TCZ-REQ9.1.**
- 12.13** In regards to the submitter's²⁶ request to change the compliance status to restricted discretionary, I have considered potential matters for assessment, such as size of car park and frontage length, as well as amenity measures that could become part of an assessment.
- 12.14** However, given that REQ9.1 provides two options for car park placement I consider the current provisions appropriate to address any possible site constraints, while achieving the fundamental underlying objectives of a best practice site layout in a high amenity town centre environment. Should a non-compliance with REQ9.1 occur then addressing each application in context and having the ability to consider all the potential effects that are relevant and necessary is seen as an appropriate measure to achieve the best possible outcome in a high amenity town centre environment.
- 12.15** **Recommendation to decline the submitter's requests to amend the compliance status of TCZ-REQ9.1.**

²⁶ DPR-0373.013

APPENDIX 1

PROPOSED DISTRICT PLAN DEFINITIONS

The proposed District Plan provided definitions for active frontage, primary and secondary frontage and public space as follows:

‘Active frontage’: In relation to buildings where the ground floor level features glazing, windows or doors which allow views into the premises. It refers to that part of the all of the building with unobscured glazing occupying the entire area between 1m and 2m in height, as a minimum.

‘Primary frontage’ as any facade of a building which provides the pedestrian access to on-site public space, or a road, or other area where the public have legal right of access.

‘Secondary frontage’ as where a development does not provide direct pedestrian access but the facade adjoins on-site public space, or a road, or other area where the public have legal right of access on two sides the secondary frontage is the facade not otherwise considered the primary frontage. Where the developments facade's adjoin on-site public space, or a road, or other area where the public have legal right of access, on more than two sides the developer may nominate which facade is the secondary frontage and therefore subject to the active frontage requirements.

‘On-site Public space’ De-facto public space occurring on private sites. This includes all places where the public may be present including visitor car parking areas, private lanes and accessways to buildings. It excludes areas such as service lanes for the delivery of goods.

APPENDIX 2

BEST PRACTISE URBAN DESIGN PRINCIPLES (CRPS 2013 Policy 6.3.2)

Principle 1-Tūrangawaewae – the sense of place and belonging – recognition and incorporation of the identity of the place, the context and the core elements that comprise the Through context and site analysis, the following elements should be used to reflect the appropriateness of the development to its location: landmarks and features, historic heritage, the character and quality of the existing built and natural environment, historic and cultural markers and local stories.

Principle 2-Integration – recognition of the need for well-integrated places, infrastructure, movement routes and networks, spaces, land uses and the natural and built environment. These elements should be overlaid to provide an appropriate form and pattern of use and development.

Principle 3-Connectivity – the provision of efficient and safe high quality, barrier free, multimodal connections within a development, to surrounding areas, and to local facilities and services, with emphasis at a local level placed on walking, cycling and public transport as more sustainable forms of transport.

Principle 4-Safety – recognition and incorporation of Crime Prevention Through Environmental Design (CPTED) principles in the layout and design of developments, networks and spaces to ensure safe, comfortable and attractive places.

Principle 5-Choice and diversity – ensuring developments provide choice and diversity in their layout, built form, land use housing type and density, to adapt to the changing needs and circumstances of the population.

Principle 6-Environmentally sustainable design – ensuring that the process of design and development minimises water and resource use, restores ecosystems, safeguards mauri and maximises passive solar gain.

Principle 7-Creativity and innovation – supporting opportunities for exemplar approaches to infrastructure and urban form to lift the benchmark in the development of new urban areas in the Christchurch region.

APPENDIX 3

CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN (CPTED) (Selwyn District Council Policy C602)

There are four key overlapping CPTED principles. They are:

1. Surveillance – people are present and can see what is going on.
2. Access management – methods are used to attract people and vehicles to some places and restrict them from others.
3. Territorial reinforcement – clear boundaries encourage community ‘ownership’ of the space.
4. Quality environments – good quality, well maintained places attract people and support surveillance.

APPENDIX 4

EXAMPLES OF SUPERMARKETS THAT ACHIEVE ACTIVE FRONTAGE AND WHERE CAR PARKING IS LOCATED TO THE SIDE OR BACK OF SITE

Pakk'n'Save Rolleston Drive- RC 185641



Pak'n'Save Queenstown

New World- Durham Street

