

To: **Members of the Hearing Panel for Nukuhau Private Plan Change 37**

RE: **Missed points during oral submission requesting review of currently submitted Planning Proposal**

Thank you for the chance to highlight two intertwined issues; your time and consideration is very much appreciated. For brevity, I reflect page numbers for your reading of quoted relevant sections.

I note that "**Section 42A Report**", **page 91** contains a rejection for my submission on "**Appendix C6 Landscape and Urban Design**" that states: "*I acknowledge...requirements of Section 32.*" I would strongly state here I am not looking for a "design guide" like a Home Owners Association in many parts of the States which lord over their residents what size flags can be installed. I am stating for means of CPTED and Stormwater impervious surface avoidance, it needs to be rethought, and set out in the Master Planning stages.

Specifically, the current Planning Proposal found in "**Appendix C Proposed Plan Change Provisions and Structure Plan Map**", particularly **Standards 9.3 - 9.5** works against the CPTED<sup>1</sup> philosophies as such:

1. **Surveillance**- both Standards 9.3 and 9.5 request double rows of trees on the "Parking" side. This would highly impede Line of Sight (LOS) to parked vehicles from the adjacent units; it is effectively a triple row from the opposing side, in regards to house frontages opposite them, where I believe CPTED encourages open and low borders (**Natural approach to design**) and (**Surveillance - people are present and can see what is going on**). NZ native trees are notoriously slow to grow, hence their lack of inclusion in carbon offset forests; as such, the desired maturity heights of 10-20m would be an ongoing process until their branches are clear of necessary viewshafts and would be a hindrance to surveillance until such time as they were sufficiently grown to clear it - possibly a 10+ year wait.
2. **Access Management** - utilizing garages and short driveways along lanes aligned to the rear of properties would restrict potential criminals due to the lack of vegetation to hide within, and any second storey windows, generally bedrooms, provide clear LOS for nighttime surveillance during peak crime.
3. **Quality environments** - if we want more copy/paste streets like Taupo View with on-road parking, we know what will happen to the quality of the vegetation, kerbing, pumice runoffs from people parking on the landscape strip, etc. - thus leading to less active use by residents, lowering surveillance and enticing potential criminal activity. Reallocating the frontage for either: larger front yards where neighbours can gather in a quieter and less vehicularly-saturated area which also helps achieve Vision Zero goals since kids would more likely play in yards, not the lanes, so much lower chance of being run over by reversing vehicles; or, leading overall to more concentrated sites so as to increase overall stock from the available area which would have a meaningful impact on housing stock and affordability would be far more desirable than a road reserve of 22 meters - nearly three times the height of allowed buildings in the zone.

In addition, the drastic nature of such a magnitude of impervious surfaces as these Standards calls for - whether arterial or secondary collector - flies in the face of the **Waikato stormwater management guide**:

1. **Page 58 (5.3.4.1 - roads)** specifically highlights the "excessive" widths of "first order streets" even when only "7.5 meters wide", yet **Standard 9.5** for Secondary Collectors is 11 meters width. I would specifically ask you to please read the last paragraph on **page 58** which concludes "*It is important to downsize streets, both their length and width, wherever possible.*"
2. **Page 60 (5.3.4.4 - parking)** "Many different aspects...maximum parking ratio." **Page 61** "The first parking-related...be adjusted downward." "Secondly, maximize sharing...to utilize sharing options."
3. **Page 62 (5.3.4.5 - driveways)** "Solutions to driveway imperviousness...closer to the road;"
4. **Page 71 (5.6 - summary)** "It is expected that storm water designers will consider the various approaches to design and *not just go with the approach that maximizes site development potential* (emphasis mine)."

Finally, the "**Appendix B WRC Scoring Matrix**" in "**Appendix F Stormwater Management Report**" **pages 32-35** show a grievous lack. They show calculations of 16 total points, with a minimum of 15 needed, but recommended to get *at least 21*. Utilizing mandated greywater on every site in the Planning Area for gardening, toilet and laundry use gets another 3. Requiring the planned commercial roof(s) to be non-contaminant leaching materials (even possibly a garden roof) is another ~3 points.

Currently, the plan as-is barely makes muster, and I refute the notion given in oral testimony that it is a "robust" plan, based on the provided current scoring and numerous LID options not even investigated (**page 34**).

Regards, Thomas Hendricks

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<sup>1</sup> <https://www.justice.govt.nz/assets/Documents/Publications/cpted-part-1.pdf> page 5