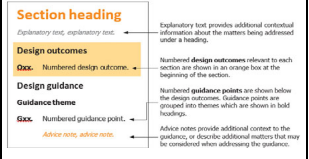


Subdivision Design Guide

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
Introduction							
Intent							
	<p>The intent of the Subdivision Use Design Guide is to facilitate well-designed subdivision of greenfield land and subdivision providing over 20 allotments.</p> <p>The design outcomes and guidance points contained within this Design Guide set out how development can fulfil this intent.</p>		N/A as introduction			<p>Kāinga Ora [391.196, 391.197] seek to delete all references to design guides throughout all rules in the PDP, including the deletion of the Subdivision Design Guide. The submitter requests that the matters currently included in Design Guides are included in zone provisions with clearer definition of the design outcomes the District Plan seeks to achieve</p>	<p>Intent</p> <p>The intent of the Subdivision Use Design Guide is to facilitate well-designed subdivision of greenfield land and subdivision providing over 20 allotments.</p> <p>The design outcomes and guidance points contained within this Design Guide set out how development can fulfil this intent.</p>
Application of this Guide							
	<p>The provisions of the following District Plan chapters set out the circumstances where this Design Guide will be applicable to a resource consent application:</p> <ul style="list-style-type: none"> •SUB - Subdivision •DEV2 - Lincolnshire Farm Development Area •DEV3 - Upper Stebbings and Glenside West Development Area <p>Where provided for by the provisions of the District Plan, the Council will use this Design Guide as part of its assessment of a development proposal.</p>		N/A as introduction		Repeat but tailored to SUB		<p>Application of this Guide</p> <p>The provisions of the following District Plan chapters set out the circumstances where this Design Guide will be applicable to a resource consent application:</p> <p>•SUB—Subdivision</p> <p>•DEV2—Lincolnshire Farm Development Area</p> <p>•DEV3—Upper Stebbings and Glenside West Development Area</p> <p>Where provided for by the provisions of the District Plan, the Council will use this Design Guide as part of its assessment of a development proposal.</p>
Structure of this Guide							
			N/A as introduction		Repeat		

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
	<p>This Design Guide is structured into three sections:</p> <ol style="list-style-type: none"> 1. Responding to the natural environment in an urban context 2. Effective public-private interface 3. Well-functioning sites <p>Each section is structured around a series of related design outcomes followed by a series of guidance points that support development to achieve those outcomes.</p> <p>Design outcomes are the outcomes that would be demonstrated by a well-designed, well-functioning urban environment.</p> <p>Guidance points set out how development can be designed to achieve the design outcomes.</p>		N/A as introduction		Repeat but tailored to SUB		<p>Each section is structured around a series of related design outcomes followed by a series of guidance points that support development to achieve those outcomes.</p> <p><u>There are directive guidance points including terms such as "design", "provide", "locate", "Configure", "Create", "minimize" which are fundamental to achieving the design outcomes where it is expected that the matter is integrated into the design.</u></p> <p><u>In addition, there are consideration guidance points including the word "consider". It is expected that an applicant will consider the matter and integrate this within the design where appropriate, and if not, supported by a rational reason for not doing so.</u></p> <p><u>Advice notes provide advice and additional information to the guidance points. Where these include terms such as "consider", they shall be read in relation to the advice and shall not influence the status of the guidance point.</u></p> <p><u>Design outcomes are the outcomes that would be demonstrated by a well-designed, well-functioning urban environment.</u></p> <p><u>Guidance points set out how development can be designed to achieve the design outcomes.</u></p>
	Relationship with other Guides		N/A as introduction		Repeat		
	The District Plan includes several other Design Guides that may also apply to the development. The applicability of these other Design Guides will depend on the activity being proposed, and whether the provisions of the District Plan provide for those Design Guides to apply to the activity.		N/A as introduction		Repeat		<p><u>Relationship with other Guides</u></p> <p><u>The District Plan includes several other Design Guides that may also apply to the development. The applicability of these other Design Guides will depend on the activity being proposed, and whether the provisions of the District Plan provide for these Design Guides to apply to the activity.</u></p>
	Other requirements		N/A as introduction		Repeat		

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
	<p>This Design Guide does not address the range of other requirements that may apply to development, including those set out in the objectives, policies, rules and standards of the District Plan, other relevant RMA planning documents and regulations, relevant Council bylaws, or requirements under other Acts (such as the Building Act 2004).</p> <p>Technical and engineering criteria relating to the implementation of development are contained in the separate Code of Practice for Land Development.</p>		N/A as introduction		Repeat but tailored to SUB		<p>Other requirements</p> <p>This Design Guide does not address the range of other requirements that may apply to development, including those set out in the objectives, policies, rules and standards of the District Plan, other relevant RMA planning documents and regulations, relevant Council bylaws, or requirements under other Acts (such as the Building Act 2004).</p> <p>Technical and engineering criteria relating to the implementation of development are contained in the separate Code of Practice for Land Development</p>
	How to use this Guide		N/A as introduction		Repeat		How to use this Guide
	<p>Applicants should demonstrate how the proposal fulfils the intent of this Design Guide. The preparation of a Design Statement provides applicants with the opportunity to do this.</p> <p>The Design Guides are intended to be applied in a manner that recognises the unique nature of individual proposals. Applicants need only apply those design outcomes and guidance points that are relevant to the proposal. Guidance points that are only relevant where the proposal includes a residential activity are highlighted in green throughout this Design Guide.</p> <p>The Design Guides are also intended to promote design innovation. The Design Statement provides applicants with the opportunity to explain how a design outcome may have been addressed using an alternative approaches to those set out in the relevant guidance points.</p>		N/A as introduction		Repeat		<p>Applicants should demonstrate how the proposal achieves the Design Outcomes as set out in the guide. Fulfills the intent of this Design Guide.</p> <p>The preparation of a Design Statement provides applicants with the opportunity to do this.</p> <p>The Design Guides isare intended to be applied in a manner that recognises the unique nature of individual proposals. Applicants need only apply those design outcomes and guidance points that are relevant to the proposal. Guidance points that are only relevant where the proposal includes a residential activity are highlighted in green throughout this Design Guide.</p> <p>The Design Guides isare also intended to promote design innovation. The Design Statement provides applicants with the opportunity to explain how a design outcome may have been addressed using an alternative approaches to those set out</p>
	Design Guide format		N/A as introduction		Repeat		

Proposed Design Guide as included in		Assessment of guidance points			Changes suggested in submissions/evidence		
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
	<p>Design Guide format</p> <p>This Design Guide is structured using the following formatting conventions:</p>  <p>Section heading Explanatory text provides additional contextual information about the matters being addressed under a heading.</p> <p>Design outcomes Numbered design outcomes relevant to each section are shown in an orange box at the beginning of the section.</p> <p>Design guidance Numbered guidance points are shown below the design outcomes. Guidance points are grouped into themes which are shown in bold headings.</p> <p>Guidance theme Numbered guidance points.</p> <p>Advice notes Advice notes provide additional context to the guidance, or describe additional matters that may be considered when addressing the guidance.</p>		N/A as introduction		Repeat		N/A
	Preparing a Design Statement		N/A as introduction		Repeat		
	<p>To assist with the efficient assessment of a proposal, applicants should include a Design Statement as part of their resource consent application. A Design Statement should include:</p> <ul style="list-style-type: none"> •A description of the site and its context •A description of the proposal •Description of which design outcomes and guidance points within the Design Guide are relevant to the proposal •Explanation of how the proposal addresses each of the relevant design outcomes and guidance points •Where relevant, explanation of any alternative approaches used to address a design outcome. <p>The Design Statement can include written and/or visual material, and should include a level of information that corresponds with the scale and significance of the proposal.</p>		N/A as introduction		Repeat		<p>Preparing a Design Statement</p> <p>To assist with the efficient assessment of a proposal, applicants should include a Design Statement as part of their resource consent application. A Design Statement should include:</p> <ul style="list-style-type: none"> • A description of the site and its context • A description of the proposal • Description of which design outcomes and guidance points within the Design Guide are relevant to the proposal • Explanation of how the proposal addresses each of the relevant design outcomes and guidance points • Where relevant, explanation of any alternative approaches used to address a design outcome. • <u>Explanation as to why design outcomes and guidance points within the Guide are not relevant to the proposal.</u> • - <p>The Design Statement can include written and/or visual material, and should include a level of information that corresponds with the scale and significance of the</p>
	DESIGN OUTCOMES						
	Responding to the natural environment				Repeat		Responding to the natural environment in an urban context
O1.	New development acknowledges the natural environment as part of creating a sustainable and resilient built environment that responds to the topography, vegetation and ecosystems of the site and its surroundings, within the context of the planned urban environment.		RDG		Repeat		N/A

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
O2.	Methods to maintain or enhance the mauri (the health and wellbeing) of waiora (water), where required, are integrated into the overall design of the development in a manner that provides for the amenity of the living environment.		RDG		Repeat		This should include response to other existing features.
	Effective public-private interface				Repeat		
O3.	New development is configured and designed to contribute positively to the visual quality, spatial definition, amenity, and safety of adjacent streets and the public realm.		RDG. Covered in District Plan Chapters i.e. Infrastructure, Transport, Subdivision.		Repeat		N/A
O4.	The layout of new development (including street blocks, sites and open space) enhances the surrounding neighbourhood.		RDG. Covered in District Plan Chapters i.e. Infrastructure, Transport, Subdivision.		Repeat		N/A
O5.	Mana whenua sites of significance are acknowledged and celebrated.		RDG, SASM Chapter.		Repeat		N/A
	Well-functioning sites				Repeat		N/A
O6.	New development maintains or enhances the walkability and permeability of the pedestrian network.		Covered in District Plan Chapters i.e. Infrastructure, Transport, Development Areas etc.				N/A
O7.	New development provides for safe and convenient cycle and pedestrian movement and access.		RDG. Covered in District Plan Chapters i.e. Infrastructure, Transport, Subdivision.		Similar		N/A
O8.	Vehicle access, garage doors and car parking do not dominate the streetscape.		RDG		Similar		For O8 – this is covered by other guides and impossible to address for vacant subdivision.
O9.	Open spaces are designed and located to provide amenity and be accessible, safe and easily maintained.		Covered in District Plan Chapters i.e. Open Space Zone, Subdivision, Development Areas etc.				N/A
O10.	Servicing is provided for in a manner that integrates with the site and minimises adverse effects on the surrounding streetscape and neighbours.		Covered in District Plan Chapters i.e. Infrastructure, Three Waters, Subdivision, Development Areas etc.				N/A
GUIDANCE POINTS							
	Responding to the Natural Environment						
	Responding to whakapapa of place						

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
G1.	Prepare a contextual analysis that depicts how the development proposal positively contributes to the surrounding area. Contextual analysis should include the following: Natural environment Cultural context •Te Ao Māori •Heritage context •Streetscape •Movement •Site characteristics •Built form •Land use •Urban structure <i>Opportunities and constraints</i>		<i>Covered by RDG G1. A contextual analysis has already been undertaken for areas identified for future subdivision and development and is expressed through the objectives and policies of the FUZ and Development Area chapters.</i> <i>Māori sites of significance, historic heritage, and viewshafts are addressed through overlays and objectives and policies in the SASM, HH, and VIEW chapters.</i>		Repeat		Adjust similar to RDG – design statement is now suggested rather than requiring in a guidance point. Consider context and respond to it should be the focus.
G2.	Retain notable landscape elements and create new features to give a distinctive and memorable sense of place.		<i>Covered generally by RDG G1 and DEV2-P6 and DEV3-P4.6. 'The site' guidance points in Rural DG.</i>				What is notable? Or elements that contribute to the local character and amenity?
G3.	Identify and respond to the patterns and features within and surrounding the site. These can be defined by: 1. Landform 2. Local vegetation scale and type 3. Connections to parks, reserves and public spaces		<i>Covered by RDG G1</i>	<i>New SUB-PX.2: Respond to site topography by ensuring any contour modification or large retaining structures are minimised to be sympathetic to existing natural ground form and landscaped to soften visual impacts;" and SUB-PX.4: 'Provide safe, accessible and legible connections to and through open spaces, key routes and local destinations'</i>			N/A
G4.	Identify and respond to the natural and cultural landscape heritage within and surrounding the site, including but not limited to: 1. Māori sites of significance and their traditional uses 2. Enhancing identified view shafts to maunga and awa/moana of significance to mana whenua 3. Native vegetation and planting 4. Scheduled heritage places		<i>Covered by RDG G1</i> <i>Māori sites of significance, historic heritage, and viewshafts are addressed through overlays and objectives and policies in the SASM, HH, and VIEW chapters.</i>	<i>New SUB-PX.6: Respond to the amenity value of views or landmarks and align streets and design public spaces to focus on these;</i>	Repeat		N/A
	Vegetation and planting						

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
G5.	Use type, species and patterns of planting that: 1. Are characteristic of the locality 2. Are of an appropriate scale for their location 3. Will enhance the development		Covered by RDG G4. INF-S13, Table 2 - INF: Street Trees, and Table 3 – INF: Street Tree Species List set requirements for street planting. The CPLD also has a section (C.4) on road amenity and berm construction which covers road design visual amenity and landscaping.	New SUB-PX.8 covers guidance points on vegetation and planting through seeking 'high quality landscape outcomes, including encouraging the retention and integration of mature trees and native vegetation that positively contribute to an area's visual amenity'			Use type, species and patterns of planting that: 1. Are characteristic of the locality [only if valued] 2. Are of an appropriate scale for their location 3. Will enhance the development
G6.	Utilise planting in conjunction with site layout and architecture to enhance the amenity and public realm interface of a development.		Agreed to be removed through conferencing for RDG.	New SUB-PX.8 covers guidance points on vegetation and planting through seeking 'high quality landscape outcomes, including encouraging the retention and integration of mature trees and native vegetation that positively contribute to an area's visual amenity'			N/A
G7.	Plant species should be suitable for growing conditions, and provisions made for maintenance.		INF-S13, Table 2 - INF: Street Trees, and Table 3 – INF: Street Tree Species List set requirements for street planting. The CPLD also has a section (C.4) on road amenity and berm construction which covers road design visual amenity and landscaping				N/A
G8.	Existing trees that contribute to local streetscape or public realm amenities should be retained and thoughtfully integrated into a new development. When a tree must be removed, the tree should be relocated on the site or a new native tree be planted in its place.		Covered by RDG G4.	New SUB-PX.8 covers guidance points on vegetation and planting through seeking 'high quality landscape outcomes, including encouraging the retention and integration of mature trees and native vegetation that positively contribute to an area's visual amenity'	Repeat		N/A
G9.	Trees located adjacent to the development, including overhanging the site or within the street front, should be retained where possible.		Covered by RDG G4.	New SUB-PX.8 covers guidance points on vegetation and planting through seeking 'high quality landscape outcomes, including encouraging the retention and integration of mature trees and native vegetation that positively contribute to an area's visual amenity'	Repeat		N/A
G10.	Consider the use of planting to mitigate storm water runoff and flooding effects.		Generally addressed by THW provisions.		Similar		Adjust the issue of existing trees inline with RDG and CMUDG.

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
	Urban Ecology						or to appropriately manage stormwater so these effects are minimised?
G11.	Retain and integrate mature trees and native vegetation that positively contribute to an area's visual amenity and ecological values.		Covered by RDG G4.	New SUB-PX.8 covers guidance points on vegetation and planting through seeking 'high quality landscape outcomes, including encouraging the retention and integration of mature trees and native vegetation that positively contribute to an area's visual amenity'.			N/A
G12.	The developments' landscaping should contribute to biodiversity and tree canopy areas and minimise the loss of ecosystems or habitats. Retaining and/or enhancing existing mature vegetation, especially native vegetation, efficiently and effectively enhances the ecosystem.		Covered by RDG G4.		Similar		Coordinate existing vegetation with RDG outcomes and guidance points including addressing the extent to which retaining is required to enhance an ecosystem on an urban site.
	Designing with topography						
G13.	Where contour modification is necessary for building platforms and access roads use planting to soften visual impacts.		Broadly covered by RDG G3.	New SUB-PX.2: Respond to site topography by ensuring any contour modification or large retaining structures are minimised to be sympathetic to existing natural ground form and landscaped to soften visual impacts;			All green field subdivision will include contour modification for roads and may be building platforms. Planting is typically used in proposed public land in streets and reserves to contribute to amenity or ecological functions. Typically this planting does not mitigate the impact of roads for example. There might be cases where retaining is required to support roads where planting can be used to address visual impact issues however this is addressed in the retaining wall guidance points. This needs further consideration.
G14.	Earthworks should be minimised to prevent disturbance to the natural ground form.		Addressed by the Earthworks Chapter i.e. EW-R6 and directive in EW-P5.	New SUB-PX.2: Respond to site topography by ensuring any contour modification or large retaining structures are minimised to be sympathetic to existing natural ground form and landscaped to soften visual impacts;			N/A
G15.	When changing the topography and landform of a site, the effects of stormwater run-off should be mitigated.		Addressed by the Earthworks Chapter i.e. EW-R6 and directive in EW-P2 and EW-P4. Also addressed through rules in the Natural Resources Plan for the Wellington Region (R101 NRP for bulk earthworks).		Similar		This suggests that the change will cause stormwater run-off effects, but that needs to be addressed regardless of whether the land form is changed.

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
G16.	Minimise the need for large retaining structures and design any required earthworks and retaining walls as positive landscape features. Where retaining walls are necessary, their visibility, formal composition and visual quality are important.		Covered by RDG G3.	<i>New SUB-PX.2: Respond to site topography by ensuring any contour modification or large retaining structures are minimised to be sympathetic to existing natural ground form and landscaped to soften visual impacts.</i>	Similar		Consider adjusting this in line with RDG
Renewable energy							
G17.	Where possible, create subdivisions that have the potential to use renewable energy sources within each lot.		Addressed through rules in the PDP Renewable Energy Chapter i.e. REG-P13 as well as SUB-P3.				These two points should be "consider" points and clarify what is actually required. This is likely to be more relevant to a site development proposal than subdivision. Or it might suggest that areas of land might be need for solar panels or wind mills? for example
G18.	Where possible, consider opportunities for joint energy schemes for multiple lots.		Addressed through rules in the PDP Renewable Energy Chapter i.e. REG-P13 as well as SUB-P3.				These two points should be "consider" points and clarify what is actually required. This is likely to be more relevant to a site development proposal than subdivision. Or it might suggest that areas of land might be need for solar panels or wind mills? for example
Designing with water							
Water ecology							
G19.	The quality and quantity of water associated with streams and natural wetlands should not be negatively impacted by subdivision and, where possible, should be improved.		Covered by higher order documents and within the PDP including NE-O2 and THW-O1.			WCC [266.178] seek that this guideline reference Natural Wetland.	Support this.
G20.	Streams, watercourses and natural wetlands should be maintained, and aquatic habitats and any associated native vegetation should be protected.		Covered by higher order documents and within the PDP including NE-O2 and THW-O1.			WCC [266.178] seek that this guideline reference Natural Wetland.	Chapter NAT addresses this.
G21.	Streams or natural wetlands should not be disturbed. However, where development does impact a stream (such as piping streams), alternative design solutions for stormwater management must be provided that will not adversely affect the waterway's quality or ecological health.	<i>Associated vegetation, including any new planting, may also enhance existing water features and habitats, add to the visual amenity of the neighbourhood, and assist with stormwater treatment and siltation management.</i>	Covered by higher order documents and within the PDP including NE-O2 and THW-O1.			GWRC [351.339, 351.340] considers that the wording of G21 should be amended to avoid suggesting the use of natural wetlands and natural watercourses as stormwater devices. WCC [266.178] seek that this guideline reference Natural Wetland.	Chapter NAT addressed streams. I understand piping of streams is not encouraged.
G22.	Waterways and stream ecology should be regenerated on sites with existing waterways either above or below ground.		Covered by higher order documents and within the PDP including NE-O2.				Chapter NAT sets out requirements for stream protection. I do not understand how a below ground outcome can be achieved or what this is actually requiring to be achieved.
Stormwater							

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
G23.	Where possible, new development should improve the quality and reduce the quantity of stormwater runoff. This could be through: 1. Incorporating existing watercourses and constructed wetlands into a stormwater plan that uses natural drainage to reduce runoff beyond the site 2. Minimising impervious surfaces 3. Providing filtration and attenuation around car parks and other large impervious surfaces 4. Capturing runoff in stormwater detention tanks for management 5. Soakage/ground water recharge 6. Rain tanks, rain gardens, permeable paving, dispersal trenches, soak pits and other techniques suitable for the site and its surrounding conditions		Generally addressed by THW provisions as well as SUB-S2, SUB-S3, and SUB-S4.		Similar	WCC [266.178] seek that this guideline reference Constructed Wetland.	I understand that the Plan seeks hydraulic neutrality for developments and therefore does not seek a reduction in stormwater runoff quantity. I support maintaining and where possible enhancing the quality of the stormwater runoff.
	Stormwater treatment						
G24.	Where possible, apply environmentally sensitive methods of stormwater disposal within public spaces wherever practical.		Generally addressed by THW provisions i.e. THW-P1/THW-R4 and SUB-P3/SUB-S4.				Where possible, apply environmentally sensitive methods of stormwater management and disposal within public spaces wherever practical.
	Effective public-private interface						
	Orientation of lots						
G25.	Orientate lot frontages onto streets and other public spaces, locate the fronts of lots opposite other fronts and connect back to backs.		Generally covered by RDG G6.	<i>New SUB-PX.7: Orient lot frontages towards streets and other public spaces to create quality streetscapes and where possible combine accessways to rear lots; and</i>			A lot abutting a street will have its frontage to the street as a matter of definition. This wording requires adjustment to be clear about "when designing new streets and blocks provide a structure where fronts of lots face fronts of other lots and backs relate to backs of others.
G26.	Minimise rear lots to enhance safety and security. Ensure that all streets and other public spaces are bounded by lot frontages or overlooked from adjoining activity.		Generally covered by RDG G6, G9, and G10. DEV3-P5.3 and DEV2-P6.7.	<i>New SUB-PX.7: Orient lot frontages towards streets and other public spaces to create quality streetscapes and where possible combine accessways to rear lots; and</i>			The two issue here should be split. Minimise rear lots is ok, but the second point needs refinement. All streets will be bound by lots (unless there is a spite strip perhaps) and by definition the lot frontage will be at the street. For a vacant subdivision the ability to determine the extent of overlooking from adjoining activity would not be possible.
	Connection to neighbouring areas and facilities						
G27.	Provide street connections to adjoining: 1. Neighbourhood centres 2. Residential areas 3. Regional walkways 4. Public facilities 5. Future development areas 6. Proposed public transport services		Covered in Subdivision policies, FUZ and DEV policies. INF-P9 and INF-P11.	<i>New SUB-PX.4: 'Provide safe, accessible and legible connections to and through open spaces, key routes and local destinations'</i>			Provide new street connections to adjoining: 1. Neighbourhood centres 2. Residential areas 3. Regional walkways 4. Public facilities 5. Future development areas 6. Proposed public transport services

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
G28.	Provide safe and accessible connections to and through recreational reserves, parks and open spaces.		Covered in Subdivision policies, FUZ and DEV policies. INF-P9 and INF-P11. OSZ-P5.	New SUB-PX.1: Are adequately served by public open space that is accessible and useable; and SUB-PX.4: 'Provide safe, accessible and legible connections to and through open spaces, key routes and local destinations'			N/A
G29.	Provide cycleways and active transport connections through all the key routes and local destinations.		Covered in Subdivision policies, FUZ and DEV policies. INF-P9 and INF-P11.	New SUB-PX.4: 'Provide safe, accessible and legible connections to and through open spaces, key routes and local destinations'			N/A
G30.	When providing walkways and street connections apply the principles of Crime Prevention Through Environmental Design (CPTED) to the design: 1. Formal Surveillance - Use signage, lighting, and sightlines to provide surveillance. 2. Lighting - Use uniform and well-distributed lighting to reduce risk and enhance wayfinding. 3. Concealment - Provide sightlines to reduce concealment along routes such as stairs underpasses, and paths. 4. Entrapment - Eliminate small enclosed spaces to reduce opportunities for entrapment. 5. Robustness - Reduce vandalism and damage, including graffiti, with robust materiality. 6. Maintenance - Ensure buildings, lighting and public space are well		RDG G14 - safe design of pedestrian access. DEV3-P5.3 and DEV2-P6.7. As well as MoD in DEV2-R47.	New SUB-PX.5: 'Demonstrate best practice for crime prevention through environmental design' combines and elevates what were very specific detailed CPTED guidance points to a clear and succinct policy.			N/A
G31.	Emphasise lighting for safety and security on pedestrian pathways, as well as on roads for cyclists and passive surveillance.		RDG G14 - safe design of pedestrian access. DEV3-P5.3 and DEV2-P6.7. As well as MoD in DEV2-R47 and DEV3-R30.	New SUB-PX.5: 'Demonstrate best practice for crime prevention through environmental design' combines and elevates what were very specific detailed CPTED guidance points to a clear and succinct policy.			Does the Plan require compliance with NZ lighting standards for roads? Is this necessary?
G32.	Design the road corridor with adequate width to accommodate pedestrians, cyclists, active and public transport users, and trees, berms and vegetation.		Code of practice and INF/TR provisions.				This should enable flexibility which combination of these elements are required at any location. It should also include reference to services which have significant impact on street design.

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
G33.	Do not light paths or spaces not intended for night-time use to avoid misleading people about their security or use.		<i>Overly specific, narrowed down to RDG G29.</i>	<i>New SUB-PX.5: 'Demonstrate best practice for crime prevention through environmental design' combines and elevates what were very specific detailed CPTED guidance points to a clear and succinct policy.</i>			N/A
G34.	Provide multiple exit points from any park, playground or otherwise enclosed area in which people might be trapped.		<i>Covered by RDG G14. CPTED matter.</i>	<i>New SUB-PX.5: 'Demonstrate best practice for crime prevention through environmental design' combines and elevates what were very specific detailed CPTED guidance points to a clear and succinct policy.</i>			N/A
G35.	Design and locate the street furniture in a coherent, safe, and accessible way for all.		<i>Code of practice and INF/TR provisions.</i>				N/A
Internal connectivity							
G36.	Provide streets in a highly interconnected, simple, accessible, and legible network structure.		<i>INF/TR including INF-P9 and INF-P11.</i>	<i>New SUB-PX.3: 'Achieve a connected, accessible, and legible street network structure'</i>			N/A
G37.	Ensure street blocks are relatively small, particularly at and close to any neighbourhood centre and provide a choice of routes.		<i>Development areas.</i>	<i>New SUB-PX.3: 'Achieve a connected, accessible, and legible street network structure'</i>			Why small? Subdivision for industrial areas are generally quite big. Does this relate to street design for new subdivisions in residential areas? If so is there a better way of guiding the size of the block?
G38.	Ensure all footpaths and cycleways have adequate width for safe, accessible and comfortable use by all people regardless of their age or disabilities.		<i>Code of practice and INF/TR provisions.</i>				N/A
G39.	Long cul-de-sacs should be avoided. Where these are necessary because of topography, their heads should be interconnected wherever possible to provide access for pedestrians and cyclists.		<i>Code of practice and INF/TR provisions.</i>	<i>New SUB-PX.3: 'Achieve a connected, accessible, and legible street network structure'</i>			N/A
G40.	Avoid providing single-mode access routes. When providing pedestrian-only routes they should be visible from the surrounding neighbourhood.		<i>Code of practice and INF/TR provisions.</i>				This is contradictory. Pedestrian only routes are single-mode routes which should not be avoided?
Significant views and landmarks							
G41.	Identify significant views or landmarks, including prominent ridges, hills and spurs, align streets and design significant public spaces to focus on these.	<i>New places and buildings that will serve an important public function should be emphasised as landmarks.</i>	<i>Repeat of SDG G2. Covered generally by RDG G1 and DEV2-P6 and DEV3-P4.6. NFL-P2.</i>	<i>SUB-PX.6: Respond to the amenity value of views or landmarks and align streets and design public spaces to focus on these;</i>			Should this be addressed in the response to context section?
Street hierarchy							

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
G42.	Street trees should be used to give local identity and amenity, spaced in a way that defines the street space and achieves visual continuity.		<i>INF-S13, Table 2 - INF: Street Trees, and Table 3 – INF: Street Tree Species List set requirements for street planting. The CPLD also has a section (C.4) on road amenity and berm construction which covers road design visual amenity and landscaping.</i>				Urban forest movements suggest a mix of trees is better than single species in streets and open space. Does visual continuity mean the same trees or just the space created? Typically trees are significantly dictated in terms of location by services and other elements such as vehicle crossings, bin locations, parking spaces etc. what continuity is important?
G43.	Where appropriate, give main routes within and through the subdivision a distinctive form and quality that differentiates them from other streets in the neighbourhood.		<i>Development areas.</i>				N/A
Safety							
G44.	Ensure illuminated areas have even lighting to prevent potential night-time concealment and entrapment spaces.		<i>Code of practice. RDG G29. CPTED matter.</i>	<i>New SUB-PX.5: 'Demonstrate best practice for crime prevention through environmental design' combines and elevates what were very specific detailed CPTED guidance points to a clear and succinct policy.</i>			Same issue as above - lighting.
G45.	Vegetation and landscaping should not obstruct the sightlines of pedestrians and other road users.	<i>Low vegetation close to walkways or the street edge should be below a driver's eye-line level. High vegetation should generally be, when a tree matures, at least two metres above ground level to maintain sightlines for pedestrians.</i>	<i>Code of practice. RDG G14. CPTED matter.</i>	<i>New SUB-PX.5: 'Demonstrate best practice for crime prevention through environmental design' combines and elevates what were very specific detailed CPTED guidance points to a clear and succinct policy.</i>			The note is important to include here otherwise very broad.
G46.	Where possible, create consistent lighting to avoid shadows that may be used for concealment.		<i>Covered by RDG G29. CPTED matter.</i>	<i>New SUB-PX.5: 'Demonstrate best practice for crime prevention through environmental design' combines and elevates what were very specific detailed CPTED guidance points to a clear and succinct policy.</i>			Same issue as above - lighting.
G47.	Avoid entrapments and minimise blind corners along routes by providing good sightlines and alternative routes.		<i>Code of practice. RDG G14. CPTED matter.</i>	<i>New SUB-PX.5: 'Demonstrate best practice for crime prevention through environmental design' combines and elevates what were very specific detailed CPTED guidance points to a clear and succinct policy.</i>			Same issue as above.
Well-functioning sites							
Shaping the lot							

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
G48.	Create lots which lead to conditions of safety in both the public and private environments.		<i>CPTED matter</i>	<i>New SUB-PX.7: Orient lot frontages towards streets and other public spaces to create quality streetscapes and where possible combine accessways to rear lots; and</i>			Typically shorter frontages compared to side boundaries or depth of site so that a greater number of sites address the street.
G49.	Provide good natural surveillance of public parks or reserve areas through the orientation of adjacent lots and adequate adjacent road frontage.		<i>Broadly covered by RDG G6. CPTED matter.</i>	<i>New SUB-PX.7: Orient lot frontages towards streets and other public spaces to create quality streetscapes and where possible combine accessways to rear lots; and</i>			Provide for good natural surveillance opportunities of public parks or reserve areas through the orientation of adjacent lots and adequate adjacent road frontage.
G50.	Shape lots to be generally compact and regular in shape.		<i>Addressed in SUB-P4.3 and SUB-P5.</i>	<i>Amendments to SUB-P4 to add 'Ensuring allotments are of a size, shape and orientation that is compatible with the nature, scale and intensity anticipated for the underlying zone or activity area's objectives and policies.'</i>			What does this mean?
G51.	When including buildings, plan and orientate lots to maximise the potential for solar gain into habitable rooms and private open spaces.		<i>Covered by RDG G1, G23, G24, G42 and G43. This SDG guideline is related to building and therefore is not necessarily relevant to subdivision.</i>				Buildings would be addressed by other guides. Ok to orientate lots to maximise sun potential
G52.	When including buildings, place the buildings to avoid unreasonable compromises to privacy, sun and outlook for neighbours.		<i>Covered by RDG G25, G41. This SDG guideline is related to building and therefore is not necessarily relevant to subdivision.</i>				Would be addressed by other guide? Or does this cover a three lot subdivision?
G53.	In cases where land subject to subdivision and development proposals are located near, or traversed by, high voltage electricity transmission lines, reference Transpower's Development Guide for development near high voltage transmission lines.		<i>Covered by SUB-R28.</i>				Principle is to not refer to other documents – delete
Usable outdoor space							
G54.	Plan for building footprints that allow for at least one primary outdoor space of reasonable size.		<i>Addressed through building rules in the relevant underlying zones. SUB-P4 encourages joint applications for subdivision and land use and 'ensuring standalone subdivision proposals provide allotments that can be feasibly developed and are fit for the future intended purpose.'</i>	<i>Amendments to SUB-P4 to add 'Ensuring allotments are of a size, shape and orientation that is compatible with the nature, scale and intensity anticipated for the underlying zone or activity area's objectives and policies.'</i>			Covered by other guides?
Vehicle crossings and accessway							

Proposed Design Guide as included in			Assessment of guidance points			Changes suggested in submissions/evidence	
#	Guidance Point	Advice Notes	Duplicative of provisions within the PDP?	Proposed new SUB Chapter policy	Repeat of RDG?	Relevant submission points	ISPP Wrap-up Hearing - Nick Rae's evidence:
G55.	Provide good accessibility to, from and within an area that ensures different modes of access and routes.		SIB-P3. INF/TR and development areas.	New SUB-PX.4: 'Provide safe, accessible and legible connections to and through open spaces, key routes and local destinations'			N/A
G56.	Provide for vehicle access and future garaging in a location and configuration that minimises earthworks and does not dominate either the streetscape or the interior of the development.		Covered by RDG G15-G21. INF/TR and development areas.				Split to address vehicle access to a site – garaging could be a consideration when designing a subdivision say for terraces where garaging is off a rear lane
G57.	Ensure that the frequency, design and width of vehicle crossings does not undermine the pedestrian experience of the street and enables the protection of streetscape vegetation and mature trees.		Covered by RDG G15-G21. INF-P11 seeks to enable safe and effective connections between sites and the transport network including the 'safe functioning of the transport network and the safety of pedestrians, cyclists and micromobility device users'				Use same as in RDG to change this
G58.	Provide alternatives to vehicles accessing from the front for multi-unit developments, such as: 1. Rear access lanes 2. Grouped or clustered carparking 3. No on-site carparking provision for some units in locations where public transport is easily accessible		Covered by RDG G15-G21. INF/TR and development areas.	New SUB-PX.7: Orient lot frontages towards streets and other public spaces to create quality streetscapes and where possible combine accessways to rear lots; and			N/A
G59.	Offset or otherwise articulate long vehicle accessways to reduce vehicle speeds, and landscape them to make them visually attractive.	Avoid long, narrow lanes or expanses of asphalt unrelieved by landscape elements. Instead, enhance the visual appearance of these spaces for users and neighbours with landscaping or other design elements. This will also help minimise the impact on neighbouring lots of passing cars.	Covered by RDG G15-G21. TR-S6 (Design of Driveways) requires driveways to be designed to achieve design speeds as per Table 9 - TR - Design of driveways. The CPLD also has a section (C.4) on road amenity and berm construction which covers road design visual amenity and landscaping.	New SUB-PX.7: Orient lot frontages towards streets and other public spaces to create quality streetscapes and where possible combine accessways to rear lots; and			Amend as follows: Offset or otherwise articulate long vehicle accessways to reduce vehicle speeds, and landscape them to make them visually attractive and safe.
G60.	Where possible, combine accessways to rear lots to minimise the visual impact of these and associated kerb crossings on the neighbourhood.		Covered by RDG G15-G21. INF-P11 seeks to enable safe and effective connections between sites and the transport network including to 'share and minimise the number of connections'.	New SUB-PX.7: Orient lot frontages towards streets and other public spaces to create quality streetscapes and where possible combine accessways to rear lots; and			N/A