

Before the Selwyn District Council

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*under:* the Resource Management Act 1991

*in the matter of:* Proposed Private Plan Changes 81 and 82 to the  
Operative District Plan: Dunns Crossing Road, Rolleston

*and:* **Rolleston Industrial Developments Limited** and  
**Brookside Road Residential Limited**  
*Applicant*

Supplementary evidence of David Compton Moen (Urban design  
and landscape)

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Dated: 24 November 2022

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Reference: JM Appleyard (jo.appleyard@chapmantripp.com)  
LMN Forrester (lucy.forrester@chapmantripp.com)

chapmantripp.com  
T +64 4 499 5999  
F +64 4 472 7111

PO Box 993  
Wellington 6140  
New Zealand

Auckland  
Wellington  
Christchurch



### **SUPPLEMENTARY EVIDENCE OF DAVID-COMPTON MOEN**

- 1 My full name is David John Compton-Moen. I am a Director at DCM Urban Design Limited.
- 2 In this evidence I:
  - 2.1 Address the supplementary planning evidence of Mr Jeremy Phillips, insofar that this is relevant to urban design matters.
  - 2.2 Address the key points of agreement and disagreement in the joint witness statement ('JWS') on urban design matters.

### **SUPPLEMENTARY EVIDENCE OF MR PHILLIPS**

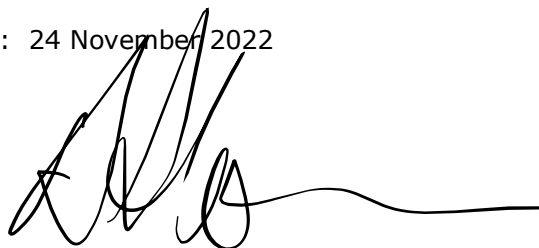
- 3 Mr Phillips' supplementary evidence identifies a number of reasons why a Living zoning with an Odour Constrained Area overlay restricting sensitive activities is more appropriate for the potential buffer area on the PC82 block, than retaining Rural zoning. Relevantly, he identifies a number of significant planning constraints that Rural zoning would have on the potential future use of this buffer area for urban activities as defined in the CRPS, including recreation activities.
- 4 In my view, if recreational activities or other suitable urban activities that are complementary and supportive of the adjacent residential areas in PC82 were unable to establish this would be a significant lost opportunity and a poor urban design outcome. In particular, I note the concerns expressed by Ms Lauenstein and I in the JWS that limiting this buffer area to rural use risks poor connectivity and integration. I elaborate on this further below where I discuss the areas of disagreement in the JWS.

### **JOINT WITNESS STATEMENT ON URBAN DESIGN**

- 5 In the conferencing of the urban design experts, as described in the JWS, the following key areas of agreement were reached:
  - 5.1 There is agreement between the experts that the revised ODP attached to this statement provides an acceptable and functional alternative to the original ODP. In other words the experts consider that the extension of the odour control setback does not compromise the integrity of the revised ODP.
- 6 Notably for the point above Ms Lauenstein and I considered that the revised ODP would function better if PC73 were approved for higher density residential development, but believe that it would still function with the LLRZ provided the proposed connections through (between PC73 and 82) were implemented.

- 7 In terms of areas of disagreement these are set out in the JWS.
- 8 Ms Lauenstein considers a residential zoning with a rule preventing the erection of dwelling would be most appropriate as this would allow the buffer area to be part of the ODP and provide public access to support adjacent residential development. I agree with this statement noting that the OCAs originally developed for the Holmes and Skellerup Blocks were recognised as a tool to manage the land and provide for compatible activities without having houses.
- 9 A residential zoning would provide better standards for roading and pathways, ongoing maintenance, appropriate street lighting levels and generally achieve safer environments with more passive surveillance.
- 10 A residential zoning would also ensure the area remains accessible to public and is not be fenced off. Ms Lauenstein voiced concerns that removing the buffer area from the ODP and leaving it rural will create an isolated 34ha rural pocket with potential for reverse sensitivities due to unsuitable rural activities and limited to no access.
- 11 I agree and add that future proofing the area for residential development would be appropriate as it would allow the ODP to be developed in case the RRP were to move to a different location in the future or improve their methods which would reduce the potential for odour effects.
- 12 Mr Nicholson considers that the zoning should reflect the anticipated uses and that given residential activities were not anticipated within the setback in the foreseeable future, a residential zoning was not appropriate. In his opinion a rural zoning would facilitate the majority of the land uses that the experts considered were appropriate; and that roads along the edge of the odour control setback would provide an appropriate level of flexibility for future uses. I disagree with this statement as it is likely this area will be developed in the foreseeable future and that any ODP/zoning should reflect this potential. I also understand from the evidence of Mr Phillips that many of the uses the experts considered appropriate would not be able to be established under rural zoning.

Dated: 24 November 2022



David Compton Moen