

Attachment D – Rough Milne Mitchell RFI Response Memo

Memorandum

To	Selwyn District Council	From	Tony Milne, Director, RMM Landscape Architects
		Project reference	23078
Date	2024-08-16	Pages (including this page)	8
Subject	PC240002: Private Plan Change Request to the Partially Operative Selwyn District Plan (V2) by Foodstuffs (South Island) Properties Limited at 157 Levi Road, Rolleston – Request for Further Information (RFI) – Landscape and Visual Amenity Response		

This technical note has been prepared in response to the RFI issued by Selwyn District Council on 21 June 2024 for the private plan change request to the Partially Operative Selwyn District Plan (V2) at 157 Levi Road, Rolleston in relation to landscape and visual amenity issues raised by Mr John Lonink following peer review of urban design matters.

The LVA matters have been included under the heading 'Urban Design' in the RFI. It is recognised that matters of urban design, built form and landscape outcomes for the PCR are interlinked and, on this basis, a collaborative response to address the matters raised has been adopted by RMM and DCM Urban Design.

The response as set out below should be read in conjunction with the following:

1. DCM Urban response in relation to urban design matters – dated 16 August 2024
2. DCM Urban additional visual renders (Appendix One to the DCM Urban Response) – dated 19 August 2024.
3. Aurecon cover letter – dated 19 August 2024

Items 4.2 and 4.3.

4.2 The newly proposed ODP shows a loss of two Indicative Cycle and pedestrian routes. Neither the Landscape Assessment Report (LAR) written by Mr Tony Milne nor the Urban Design and Visual Impact Assessment (UDVIA) written by Mr Dave Compton-Moen have assessed the effects of this reduction in connectivity and from a neighbourhood amenity perspective. Please provide an assessment of the effects on neighbourhood pedestrian and cycle connectivity as a result of the changes to the ODP.

4.3 Changing the zoning from the Medium Density Residential Zone (MRZ) to the Large Format Retail Zone (LFRZ) has additional effects regarding connectivity within the anticipated environment and the walkability of the neighbourhood. Within the MRZ any development would require a subdivision consent and it would trigger an assessment regarding walkable blocks. Walkable blocks are of significant importance for a well-functioning urban environment. Please provide a rationale of how the proposal will achieve a similar or better outcome than would be anticipated by a

RMM response

The proposed ODP removes the two indicative cycle and pedestrian routes when compared to the ODP in the Partially Operative District Plan (PODP) (**DEV-RO1-** Rolleston 1 Development Area). The proposed ODP does however show an indicative cycle/pedestrian route and an indicative road connecting Lincoln Rolleston Road and the MRZ land to the east. This indicative new primary road link is a future extension of Broadlands Drive which will eventually provide direct east-west access to the proposed District Park. It is also noted that the under-construction supermarket authorised by RC216016

renders the majority of the PODP – ODP redundant, including those indicative cycle and pedestrian routes. The proposed ODP cycle/pedestrian route and indicative road will better service the types of activities anticipated to operate within this land parcel.

Along with those connections aforementioned, there are nine connections shown on the proposed ODP, with four from Levi Road and five from Lincoln Rolleston Road into and out of the Site. Further to this, there are five indicative pedestrian connections within the Site itself.

Pedestrian access into the Site will be available from Lincoln-Rolleston Road at three locations. Three access points will also provide for pedestrians and cyclists on Levi Road. These will be integrated with a proposed 3m wide shared-use path on the southern side of Levi Road, (outside of the Site) which will extend from Rolleston Drive to Levi Road and thus, providing a pedestrian/ cyclist connection between the town centre and the Site.

[6.1] of the RMM Landscape Assessment Report¹ states the following:

“Regarding the NPS-UD, specifically the aspects of the relevant policies outlined in section 3.4 of this report, and as demonstrated by RC216016, the PPCR will provide good accessibility for: people living in the current and foreseeable residential areas surrounding the Site, people using foreseeable public and active transport (the northern shared path on Levi Road) and for people utilising the open space within the proposed open green space with the northwest part of the Site”.

RC216016 does not provide for pedestrian/cycle connections to the east. On the balance of the Site, and as shown on the PODP-ODP DEV-RO1, there are two indicative pedestrian/cyclist connections shown. The southernmost is shown on the proposed ODP. Given the Site boundary with the adjacent MRZ to the east is approximately 530m in length, it would be desirable to achieve a ‘mid-block’ connection for the balance of the Site. However, it is understood there are functional reasons (acoustic, health and safety and CPTED) relating to the site’s intended use that would make such a connection not only difficult to achieve, but potentially an undesirous outcome.

Further to this, and when one considers RC216016 in conjunction with the proposed ODP, taken overall, the PCR will potentially provide improved connections to green space and future cycleways than what might be anticipated if the Site was developed under its current residential zoning and ODP. Therefore, given the potential constraints of knowing how the Site is intended to be developed, and in the context of the wider connectivity available, a mid-block connection is not considered necessary. The wider connectivity provides multi modal and safe route options.

Item 4.4

Changing the zone from the Medium Density Residential Zone (MRZ) will have other visual effects currently not considered in the LAR nor has it been taken into account by the UDVA. The following matters would need consideration from an Urban Design perspective:

- *Changing the zone from MRZ to LFRZ would allow for a significant amount of signage along the road frontages of Levi Road and Lincoln Rolleston Road. This would be particular regarding, but not limited to free standing signs (SIGN-REQ1) that are a permitted activity on*

¹ Rough Milne Mitchell Landscape Architects Limited. Landscape Assessment Report. Private Plan Change Request, 157 Levi Road, Rolleston, 14 February 2024

every vehicle access. Each sign would have a permitted size of 18sqm with a width of 3 metres and up to a height of 9 metres.

- *The change to LFRZ would allow buildings of a height of 15 metres to be built at 5 metres distance from a road boundary. Neither the LAR nor the UDVIA has taken this into consideration. The ODP shows only an indicative building footprint, but it does not restrict buildings from being located elsewhere within the site.*
- *Besides the effects of allowed building size and location that could occur when changing the zone from MRZ to LFRZ there is also a significant effect in grain and building articulation. The MRZ zone allows for higher density development. However, this will still result in buildings that are residential in character and that will provide a sense of human scale. The LFRZ does not have any standards that would achieve this and will likely result in significant large bulky buildings with relatively blank façades compared to residential buildings.*
- *Changing the zone from MRZ to LFRZ would provide the owner of the land (the applicant in this case) to relinquish their consent for a supermarket within the MRZ and build a building of any activity permitted within the LFRZ to the standards of the LFRZ.*

RMM response

In response to this point, the following comments are made which have been separated into visual features associated with the LFRZ

- Road Frontage Signage
- Building Height and Setback from Road Boundary
- Bulk Form and Building Articulation

This is supported by DCM Urban renders dated 16 August 2024 attached at Appendix One of the DCM RFI Response.

Road Frontage Signage

Rule SIGN-REQ1 currently provides for free standing signs on every vehicle access as a permitted activity. Such signs are permitted up to 18m² in area, 3m in width and 9m in height.

However, RC216016 provides for pylon signs (two only) on both Levi Road and Lincoln-Rolleston Road to be only six metres in height. The approved plans show specific locations for these signs (one on Levi Road and one on Lincoln-Rolleston Road) and the consented planting for these frontages, provides for trees either side of the signs. There will be a gap in tree planting either side of the pylon signs, so they are visible, and provide necessary retail identity, without being visually dominant within the street scene.

It is worth noting that the existing shelterbelt surrounding the Site (the removal of which has been authorised by RC216016), is of a similar height (5 to 6m high), and the consented pylon signs do not exceed the height of the amenity streetlights on Levi Road, which are approximately 8m high.

From a visual amenity perspective, a LFRZ for the PAK'nSAVE (**PnS**) half of the Site is essentially giving effect to the consented outcomes that would be delivered under RC216016, including signage. These were demonstrated to be, and ultimately deemed, appropriate for this location.

Having considered the ODP and potential future overall Site layout, it is realistic to expect one additional pylon sign on Lincoln-Rolleston Road associated with the trade-based retail activity. However, as Rule SIGN-REQ1 currently allows for a sign to 9m in height, it would be appropriate for a site-specific rule to ensure consistency with the free-standing signs authorised by RC216016 in this location. Therefore, I suggest the following free standing sign rule (or similar effect) for the site:

- (a) There shall be a maximum of two free standing signs along the Lincoln Rolleston Road frontage and one free standing sign along the Levi Road frontage.*
- (b) The maximum area of a sign shall be 12m².*
- (c) The maximum height above ground level at the top of the sign shall be 6m.*

Therefore, in regard to signage, and subject to the above recommended rule, one additional pylon sign to a maximum height of 6 metres, along the Lincoln-Rolleston Road frontage will be viewed in the context of the proposed landscape treatment along the Site's interface with Lincoln-Rolleston Road.

This landscape treatment is a continuation of that required by RC216016 and as shown on the proposed ODP. The interface enabled by the PCR will provide visual interest and amenity, along with appropriate softening of future signage enabled by the PCR.

Building Height and Setback from the Boundary

Primarily there are two key matters to consider here. First, the appropriateness of the PCR provisions regarding certainty of bulk and location on the Site. Second, the effectiveness of the PCR provisions regarding the integration and/or mitigation of potential landscape and visual effects arising from bulk and location.

The existing PODP provisions, in combination with those proposed by this PCR, for building bulk and location, as identified for LRFZ, would apply to the Site. These include two standalone buildings (i.e. supermarket and trade-based retail activity) each with a GFA of no less than 6000m² for the Site, a 5m setback from the road boundary, a 10m setback from an internal boundary adjoining a residential zone, as well as a 15m max building height and a 25m max structure height.

Regarding the potential of built form being constructed to within 5 metres of the road boundary, it is considered the minimum 6,000m² GFA threshold, in combination with the identification of indicative building footprints on the proposed ODP, will enable only two large format activities to locate on the Site (in the locations shown). In addition to this, there are a limited number of ways in which the Site can functionally work for its intended activities, and this is determinative of future site layout and has informed the proposed ODP. Therefore, this provides a level of certainty in terms of outlook and the road boundary interface.

Further to that, the PODP and PCR provisions relating to the boundary treatment (LFRZ-REQ6 Landscaping) have been reviewed. These provisions primarily relate to planting requirements (species, spacings, height at planting, and mature height).

In addition, given the explicit landscaping requirements of RC216016, which are proposed to be replicated for the balance of the Site's boundaries (as identified on the proposed ODP), Site-specific landscape requirements have been proposed. These have been incorporated into the proposed ODP and are considered to be generally appropriate.

When considering these factors in conjunction they provide an appropriately scaled landscape interface to the Lincoln – Rolleston Road boundary. Together with the proposed ODP they will successfully manage potential effects relating to bulk and location and serve to integrate development on the Site with its surroundings.

Bulk Form and Building Articulation

Mr Lonick has raised concern regarding the *"significant effect in grain and building articulation"*² when compared to the built form outcome of the MRZ.

While the PCR and LFRZ-enabled activities represent a departure from the anticipated residential development on the balance land of the Site under its MRZ, it will be read as a continuation of the consented development of RC216016.

Regarding built form outcomes, co-location within the receiving environment coupled with the PCR provisions, will enable a coordinated and complementary built form and landscape outcome across the Site. While not residential in character, a LFRZ will, provide certainty in terms of built form, landscape and amenity outcome for the Site. It will enable commercial development in a cohesive manner.

When considering the potential outcome of the MRZ, a permitted baseline development could result in residential built forms closer to the boundaries and covering a larger proportion of the perimeter of the Site. It is accepted that the MRZ could result in a more diverse range of façade treatments, colours, and materiality and therefore of 'visual appeal and interest' and obviously residential in character. However, it would be likely the overall bulk and mass of built form enabled by the MRZ could read as greater than that of the proposed LFRZ on the Site.

Further to this, a MRZ permitted baseline scenario would have a range of landscape treatments given it would likely be developed by multiple individual developers and landowners, while the proposed LFRZ (with Site-specific provisions) presents an opportunity for comprehensive landscape treatment, and high level of maintenance, along the road frontages of the Site. This is an important consideration as this in part assists in softening the built form enabled by the PCR. From a landscape and visual amenity perspective, it is considered LFRZ-enabled development in accordance with the proposed ODP provides a greater level of certainty.

To further explain this, the Site could be developed by multiple developers, such as Wolfbrook, Williams Corporation and Kāinga Ora, that often develop large tracts of land for townhouse developments, and each of these, have their own design signature, in terms of façade treatments, parking arrangements and landscaping. There are many recent examples where the built form outcomes have been poor from MRZ of similar ilk. Granted, some of these developments are attractive, particularly where communal open green spaces are visible from the street. However, often the green open space will be internalised within a medium density residential development.

² PC240002: Private Plan Change Request to the Partially Operative Selwyn District Plan from Foodstuffs (South Island) Properties Limited at 157 Levi Road, Rolleston (V2) – Request for further information – Urban Design [4.4] page 6.

Regarding built form and landscape outcomes on the Site, comfort can also be taken from the proposed change to LFRZ-R1 Buildings and Structures. These would make any new building/structure or any addition or modification to a building/structure on the Site a Restricted Discretionary Activity (RDIS) and subject to CMUZ-MAT3 Urban Design – which includes:

- b. Contributes to the vibrancy and attractiveness of, any adjacent streets, lanes, or public spaces;*
- c. Takes account of nearby buildings in respect of the exterior design, architectural form, scale and detailing of the building;*
- d. Minimises building bulk through the provision of articulation and modulation, while having regard to the functional requirements of the activity;*
- h. Includes landscaping, fencing and storage, and waste areas that are designed and located to mitigate the adverse visual and amenity effects of the development on adjoining residential-zoned sites and public reserves.*

And the following proposed addition:

- 3. In the Rolleston Large Format Retail Precinct (Lincoln Rolleston Road) PRECz, the extent to which the development complies with Outline Development Plan DEV-RO1 – Rolleston 1 Development Area.*

Which as outlined above includes landscape notations/requirements. To this end, any Resource Consent application under this rule will need to include a landscape plan to satisfy the matters of discretion, irrespective of compliance with any other landscape rule.

Overall, it is considered that the combination of existing and proposed provisions for the LFRZ with a supporting ODP (with landscape requirements), will ensure an appropriate built form/landscape outcome for the Site. Further to that, and as outlined above, the ensuing Resource Consent process provides an appropriate mechanism for building articulation and modulation, as well as landscape outcomes for the Site to be assessed and specific building relief and landscape mitigation to be conditioned.

The proposed provisions and the ODP to be included in the LFRZ are appropriate to ensure consistency with the development outcome authorised by RC216016 and that effects are managed at the MRZ/LFRZ interfaces. RC216016 is subject to conditions of consent that provide certainty and confidence of an appropriate interface and integration with MRZ under the PODP, the balance land of the Site, and surrounding residential land. From a landscape and visual amenity perspective it is important these outcomes are realised with the proposed rezoning.

Item 4.5

In order to be able to assess the visual effects mentioned in the matters highlighted above please provide a comprehensive visual impact assessment that includes accurately constructed photomontages that takes into account the following:

- *a surrounding receiving environment that is in accordance with the current MRZ;*
- *all permitted and reasonably needed signage for any commercial activity that is permitted within the LFRZ;*

- *a build form that is permitted and non-fanciful at the road boundary including the proposed landscape mitigation.*

RMM response

The DCM Urban renders dated 19 August 2024 and associated visual effects are considered to be consistent with the assessment contained within the RMM Landscape Assessment Report³. The landscape-related provisions replicate those deemed appropriate in the granting of RC216106.

In essence, the MRZ enables a range of housing typologies within the zone, including up to 3-storey attached and detached residential units and low-rise apartments. Developments are encouraged to be high-quality and respond positively to the urban neighborhood character. The type of housing, such as the ratio of 2 or 3-bedroom units, amount of private/ communal green space and/ or whether off-street parking is provided, is often influenced by market demand. Residential activities generally relate to the coming and going of unit owners/ tenants and occasional visitors.

In contrast to the above, the LFRZ, and specifically with the proposed Site-specific amendments, enables large floor buildings and/or yards, typically associated with trade retail and trade supplier activities. Buildings are large-scale and mitigated by boundary setbacks and landscaped road frontages. Many large-format trade retail developments are part of a nationwide franchise, which often have a predictable design, layout, and operation. Commercial activities generally relate to customer-focused DIY-trade retail, integrated customer café, delivery of stock, and car parking for public and trade customers.

From the selected representative viewpoints, it has been assessed⁴ that both public and private views are considered to result in **Low** and at most **Low – Moderate** adverse effects, courtesy of the proposed site-specific LFRZ provisions and the requirements of the proposed ODP.

Item 4.9

The design and appearance of the built form was a significant issue for RC216016. Please provide comment on the suitability of matters within the CMUZ/LFRZ chapters to consider any visual effects of future built form on the surrounding residential environment, noting that CUMZ-MAT3 currently only considers effects on visual and amenity in terms of landscaping, fencing, storage and waste areas, not built form (CMUZ-MAT3.h).

RMM response

Having reviewed the provisions within the CMUZ/LRFZ Chapters of the PODP, these are considered to be appropriate regarding potential visual effects of future built form on the surrounding residential environment. It is noted that Council considers that CUMZ-MAT3 *“currently only considers effects on visual and amenity in terms of landscaping, fencing, storage and waste areas, not built form (CUMZ-MAT3.h)”*⁵

³ Rough Milne Mitchell Landscape Architects Limited. Landscape Assessment Report. Private Plan Change Request, 157 Levi Road, Rolleston, 14 February 2024

⁴ Ibid

⁵ PC240002: Private Plan Change Request to the Partially Operative Selwyn District Plan from Foodstuffs (South Island) Properties Limited at 157 Levi Road, Rolleston (V2) – Request for further information – Urban Design [4.9] page 7.

This is not the case, with CUMZ-MAT3.b, c and d (refer page 6 of this memo) also allowing for visual effects of future built form to be assessed. On this basis, CUMZ-MAT3.h is not the only mechanism to manage these effects. In addition, and as already mentioned, the proposed landscape treatment along the Site's interfaces is a continuation of that required by RC216016 and as shown on the proposed ODP. CUMZ-MAT3.h adds another level of surety to this.

Notwithstanding the above, a further matter of discretion that specifically addresses Council's concern regarding visual effects could be added to CUMZ-MAT3 to bolster this. Such a matter could take the form of the following:

d. Minimises effects on neighbouring sites in relation to visual dominance and shading.

16 August 2024