

**Before an Independent Hearing
Commissioner Appointed by
Selwyn District Council**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER a Proposed Variation to the Partially
Operative Selwyn District Plan
(Variation 2) 157 Levi Road Rolleston
Foodstuffs (South Island) Properties
Limited.

**Summary of evidence of John Lonink
Urban Design**

19 March 2025

EXECUTIVE SUMMARY

- 1 My full name is John Lonink. I was previously employed as an Urban Design Principal at WSP New Zealand, but now run my own consultancy, Lonink Urban Design
- 2 I am providing evidence relating to urban design on behalf of Selwyn District Council (**Council**).
- 3 In my evidence I have responded to the Urban Design and Visual Impact Assessment provided by Mr Compton-Moen, the Landscape Assessment Report by Mr Milne, the various submitters to the Plan Change proposal and the written statement of Mr Lawn regarding the Emergency Services Campus and the Broadlands Drive Extension. In addition I have read the expert statements of Mr Compton-Moen, Mr Milne, Mr Allen, Mr Metherell, Mr Johnston, Ms Parish and Mr Smith
- 4 My review of all the relevant existing ODP's for this plan change, being for DEV-RO1 (Site), DEV-RO2 and DEV-RO12, concluded that although not all the intended road, pedestrian and cycle connections link up, the combined ODP's do show a clear intention of multiple through connections.
- 5 The proposed ODP only shows a single through connection at the southern corner of the Site, but any further connections through the site are missing.
- 6 I consider the key urban design matters that need addressing are:
- 7 Is the site an appropriate location for LFRZ from an Urban Design Perspective?
 - 7.1 Although I understand the economic benefits of the site for a trade retail offering like Mitre 10, from an urban design perspective I do not see a strong benefit. As I understand from Mr Foy, there is existing land appropriately zoned that would still work from an

economics perspective (given the Bunnings is locating there as well) but would not be as desirable for Mitre 10. From an Urban Design perspective, I consider the conflicts that are arising with neighbouring land and the level of mitigation required, means this site is not very well suited for LFRZ.

8 Will the proposed Plan Change have a significant adverse effect on the character of the anticipated urban environment?

8.1 In my view, and having regard to the Selwyn District Council Residential Development Design Guide (RDDG) a residential environment in this MRZ context would have a character that is much finer grain and of a human scale compared to LFRZ types of development, even with the level of mitigation suggested. In addition, it would show a good level of diversity in urban form and planting.

8.2 As suggested by the applicant, trade retail would not be appropriate within a town centre environment because of the fine grain nature it has¹. My view is that this is the same for a residential environment, and I would consider that a MRZ context would be much more sympathetic to the surrounding lower density urban environment.

9 Does the proposed plan change and associated ODP ensure a good level of accessibility and connectivity?

9.1 Generally a MRZ environment would have a good level of 'permeability'/ connectivity for both vehicles and active modes of transport, as directed by the Partially Operative District Plan (PODP) and the Selwyn District

¹ Statement of Evidence of Dave Compton Moen, Para 38

Council Residential Development Design Guide.
(RDDG).

- 9.2 Connectivity is not only about how easy it is to get from a development site to any key activity. It is also very much about how it affects neighbourhood connectivity and the easy of moving around urban environments.
 - 9.3 To ensure a minimum level of connectivity between various new neighbourhoods the PODP requires new urban environments to have walkable blocks with a maximum perimeter of 1000 meters. The RDDG takes this a step further and recommends a perimeter of 600-800 meters.
 - 9.4 When calculating the total perimeter, based on the provided Concept Plan of the Site, allowing for pedestrians to walk across the site, and taking into account the proposed road connection to the south of the Site there would still be a perimeter of approximately 1330m.
 - 9.5 From an urban design perspective my view is that, because the Site itself is residential and sits within what is predominately a residential environment (besides the supermarket), any plan change should need to provide a level of neighbourhood connectivity that meets those walkable block standards. Currently the ODP does not.
- 10 How does the proposed plan change and associated ODP ensure an environment that is safe from both a transport safety and a CPTED perspective?
- 10.1 My view is that there is an inherent CPTED related risk with the cumulative amount of car parking associated with the proposed plan change, along Levi Road and Lincoln Rolleston Road. Car parking areas, in particular

with bad visibility and low-quality lighting, often attract criminal activity and undesirable behaviour.

- 10.2 The large format retail offering suggested by the plan change sits within what is anticipated to be predominately a residential environment (besides the consented supermarket). As a result mitigation through landscape screening is paramount to reduce visual dominance effects. This however can cause issues from a CPTED perspective as extensive planting for screening purposes can also obscures views of the parking area.
- 10.3 In regard to the 520 meters long landscape buffer along the northeast boundary I consider it can provide concealed access to any future properties located on the eastern side of the site and the retail offering.
- 10.4 A road connection through to DEV-RO12 would allow for more activity through the site and would assist with a level of passive surveillance.

KEY AREAS OF ALIGNMENT AND DIFFERENCES RELATING TO URBAN DESIGN

Matters of agreement

- 11 Both Mr Compton-Moen and I agree that the future environment will be substantially different from the current environment and urban in character.
- 12 We agree that the current anticipated environment would likely be residential with a density sitting somewhere between 15-20hh/ha. I added that a non-fanciful maximum would likely be 25hh/ha.

- 13 We both agree that additional Matters for Control or Discretion for building design will provide greater guidance for future decision makers. Although we do not fully align regarding the actual need for this.
- 14 I agree with Mr Compton-Moen with his statement in para 20c that the strategic corner of the Site (for me the Northwest corner) can provide a focal point and justifies a different pattern / activity. I believe the Supermarket sufficiently does this. In my view the site is too large to justify a complete shift in character for the whole site.
- 15 I agree with Mr Compton-Moen's statement in Para 38 of his statement of evidence that LFRZ can have a detrimental effect on the fine-grain nature of TCZ. I would however consider the same for MRZ.

Matters of disagreement

- 16 **Character**
Mr Compton-Moen considers the change in character from MRZ to LFRZ to be of a low magnitude. He sees the change in character not as adverse as it is a continuation of the commercial character of the supermarket.
- 17 I do not agree with this view and consider the change in character to be more substantial. I consider this because the grain and diversity a residential development would have is substantially different, compared to the large footprints, bulk and scale and lack of diversity a LFRZ development would have. In addition, I do not agree with the argument that because the site now has a commercial activity this character should be allowed to continue.
- 18 Mr Compton-Moen considers it is common for LFR zones to coexist with residential environments and uses a couple of examples for this. However, I would argue there are a lot more examples where LFR zones are not adjacent to residential areas

and there is a good reason for that. There are reverse sensitivity issues to be considered between these types of activity.

19 Regarding the examples used I believe there is a lot more nuance to be considered. For instance, the Mitre 10 in Papanui was built on an existing commercial / industrial site. As such the actual activity could not be considered to be inappropriate. However in my view there still is a stark contrast between the Mitre 10 and its surrounding residential environment. In addition the Site is directly abutting a commercial zone across the railway line and is not sitting within what is predominately a residential environment.

20 There is also some reliance on the domestic nature of this particular Mitre 10, however in my view this can't easily be controlled within the rules of the district plan so a trade-retail store more focussed on general trades, like many Mitre 10 are, needs to be considered.

21 **Connectivity**

Mr Compton-Moen considers the development provides a good level of connectivity and partly relies on the evidence of Mr Metherell² and partly on the surrounding network. He has not addressed the issue of not creating a walkable block of appropriate size.

22 From an urban design perspective connectivity is not only about connections to key destinations, but also about how easy it is to walk and cycle across neighbourhoods. This is where a walkable block measurement provides a good guidance. The current ODP shows a block perimeter that is roughly twice as long as recommended by the RDDG. As such I do not consider it to be a walkable block.

² Statement of Evidence Mr Compton-Moen, Para 37

- 23 Mr Metherell is basing his views on Figure 1³ in his evidence, which is a diagram where he has shown the distances between various key points and highlighted there is no discernible difference. As Mr Carr highlights in his Summary Statement⁴, there are a couple of inconsistencies in this diagram and he considers a non-car east-west connection should still be provided. I agree with Mr Carr's statement but would consider a road connection a better outcome from a CPTED perspective.
- 24 I have reviewed Mr Metherell's diagram and agree with Mr Carr that the measurements are not consistent. The distance between the key connections through DEV-RO1 have been measured using the ODP indicative roads, a valid way of measuring in my view. However, for the distances from DEV-RO12 Mr Metherell has taken a direct route to the nearest street, ignoring the ODP road layout. In my view there are two separate ways of measuring that give very different results.
- 25 To substantiate whether there is a significant difference between the two methods of measuring, I have undertaken a similar exercise using PDF-Xchange editor software on the combined ODP-maps from my evidence. This is not a highly exact way of measuring but does provide a good indication. I measured an option with shortest routes following the ODP road networks and an option where connections are direct and in the most convenient location. For the new ODP this would sit between the PAK'n SAVE and the Mitre 10, directly connecting to Lincoln Rolleston Road.
- 26 My results showed that connections to the town centre were similar to Mr Metherell, between 100 and 350 meters of difference, depending on the method (direct lines vs ODP roads). However the difference between the east-west connection within DEV-RO2 were significant showing a difference of 350 to 550

³ Statement of Evidence Mr Metherell, Para 61

⁴ Summary Statement of Evidence Mr Carr, Para 2.3-2.7

meters, depending on the method (direct lines vs ODP roads). For the connection to the future Broadlands Drive extension, following the ODP roads resulted in a difference of just under 300 meters and a slight benefit of 50 meters for the new proposal if the road is located between the two buildings.

27 In my view these differences in distance are substantial and clearly indicate a significant lower level of connectivity.

28 **CPTED**

Mr Compton-Moen in his statement of evidence relies on controlling access to areas that are not overlooked or could provide concealed access to the neighbouring site or the commercial activities. My experience is that relying on these types of control will not stop undesired access, in particular if these areas are not well overlooked outside of opening hours.

29 Both Mr Compton-Moen and Mr Milne consider there is inherent danger with mixing delivery vehicles with other transport modes. Although I am not a transport expert, and would need to rely on Mr Carr's evidence, the current proposal shows delivery vehicles having access from the main roads onto the site. As I understand it the safety concerns/ conflicts between delivery vehicles, pedestrians and cyclist can be managed through the consenting process. As such it would likely be similar in this case, and I assume that those transport safety matters can be addressed at the resource consent stage.

30 Both Mr Milne and Mr Compton-Moen have highlighted that there is a matter for control of discretion in CMUZ-MAT3 which gives Council discretion in regard to the extent to which a development is designed to incorporate CPTED principles. I understand this matter of discretion would be triggered with the establishment of any building or structure and/or any addition or modification to an existing building structure. However because of the CPTED risks identified above, I consider that having a narrative within the ODP that requires a CPTED assessment containing a lighting plan will

provide greater certainty that these CPTED risk will be identified and addressed.

Conclusion

- 31 Overall I do not consider the proposed Plan Change and ODP would result in a desirable outcome from an Urban Design Perspective. However, if on balance the plan change is deemed acceptable, I would recommend the changes as highlighted above, being a road connection through and stronger direction to assess CPTED matters for resource consent application within this new zone.