

BEFORE THE SELWYN DISTRICT COUNCIL

Independent Hearing Commissioner(s)

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.

**Statement of evidence of John Lonink on behalf of Selwyn District
Council – Urban Design**

Date: 20 February 2025

INTRODUCTION

- 1 My full name is John Lonink. I am an Urban Design Principal at WSP New Zealand.
- 2 I am providing evidence relating to urban design on behalf of Selwyn District Council (**Council**).

Qualifications and experience

- 3 I hold a Masters of Science in Architecture, Building and Planning from Eindhoven University, and a Bachelor of Science in Engineering from Hogeschool Brabant, Tilburg.
- 4 I am a registered architect in the Netherlands, a member of the New Zealand Urban Design Forum and an affiliate member of the NZILA.
- 5 I have over 18 years of experience in the architecture and urban design industry in both the public and private sectors. I have worked as an urban designer on projects in the Netherlands and in New Zealand.
- 6 I have provided urban design advice and given evidence on multiple applications both representing local authorities as well as private sector clients.
- 7 I have given urban design evidence in the Environment Court on behalf of Christchurch City Council on the application for a mixed-use development proposal by Woolworths New Zealand Limited at 201 Halswell Road in 2020.
- 8 I was responsible for the design of the Masterplan for the Lot20 masterplan within the wider EUL in Taupō on behalf of Taupō District Council. A s127 application was needed to amend the wider masterplan that had been previously consented, and I provided the urban design rationale for this application in 2021.

- 9 I was responsible for the design of the Paeroa Racecourse Masterplan for a mixed-use development on the former Paeroa Racecourse site for WFT Finance & Investment Company Limited, and I provided urban design evidence to support the plan change associated with the masterplan in 2021.
- 10 Recently I have provided a statement of evidence on behalf of Selwyn District Council on the appeal by CSI Property Limited for the proposed Rolleston West Residential Limited development and assisted Council as expert witness during mediation.

Code of conduct

- 11 Although this statement of evidence is not intended for an environment court hearing, I have prepared this statement in accordance with the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I will continue to comply with it while giving oral evidence. My qualifications as an expert are set out above. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

Scope of evidence

- 12 My statement of evidence covers the following matters:
- 12.1 Strategic Context of the proposal.
 - 12.2 A synopsis of the proposed Outline Development Plan (**ODP**) and how it relates to the neighbouring outline development plans.
 - 12.3 Matters to address from an Urban Design Perspective.
 - 12.4 Urban Design evidence from Mr Compton-Moen and my response.

- 12.5 Relevant submissions and my response
- 12.6 Conclusion
- 13 In preparing my evidence I have considered the following statutory and strategic documents as well as the following evidence provided by other specialist:
 - 13.1 National Policy Statement on Urban Development (**NPS-UD**)
 - 13.2 Partially Operative District Plan, Appeals Version (**PODP**)
 - 13.3 Selwyn District Council Residential Development Design Guide. December 2024 (**RDDG**)
 - 13.4 Canterbury Regional Policy Statement (**CRPS**)
 - 13.5 Greater Christchurch Spatial Plan (**GCSP**)
 - 13.6 Rolleston Structure Plan 2009 (**RSP**)
 - 13.7 The Urban Design Protocol 2005 (**UDP**)
 - 13.8 Statement of evidence Gabriel Ross - Landscape
 - 13.9 Statement of evidence Andy Carr - Traffic
 - 13.10 Statement of evidence Derek Foy - Economics
 - 13.11 Statement of evidence Hugh Blake Manson – Servicing
 - 13.12 Section 42a report Craig Friedel - Planning
- 14 I have read and considered the following pieces of information and assessment reports provided by the applicant:

- 14.1 Planning Report by Mr Bramantino Armiento (Private Plan Change Request – Large Format Retail Zone -157 Levi Road, Rolleston)
 - 14.2 Urban Design and Visual Impact Assessment and supporting Drawing package by Mr David Compton-Moen
 - 14.3 Landscape and Visual Impact Assessment and supporting Drawing Pack by Mr Tony Milne
 - 14.4 Commissioner Decision and Approved Plans for RC216016 in relation to the adjoining supermarket site development.
 - 14.5 The Proposed Outline Development Plan (ODP) and Revised Proposed Changes to PODP Provisions.
- 15 I have read the individual submissions and the further submission by Canterbury Regional Council for this plan change application.

BACKGROUND

Context of the proposal

- 16 The plan change request submitted by Foodstuffs (South Island) Properties Limited is to rezone 7.3 Hectares of Land at 157 Levi Road in Rolleston (**Site**) from a Medium Density Residential Zone (**MRZ**) to a Large Format Retail Zone (**LFRZ**) with Site specific zone requirements.
- 17 The Site is located on Southeast corner of the prominent intersection between Lincoln Rolleston Road and Levi Road.

- 18 In September 2022 a resource consent was granted for a Pak 'n Save supermarket with associated car parking and landscape treatment on the northern part of the Site.
- 19 A large part of the surrounding area of the Site is currently still defined by open paddocks delineated by shelter belts around its outer perimeter. All the land surrounding the Site is zoned MRZ.
- 20 Besides current construction works of the supermarket there is residential development occurring west of Lincoln Rolleston Road and it can be anticipated that the surrounding environment of the Site will see a considerable amount of change in the near future.
- 21 The north-west corner of the Site is located just over 400 meters from the edge of the Town Centre Zone (**TCZ**) which is a walkable distance.
- 22 The north-eastern boundary of the Site is approximately 430 meters away from the Future District Park as shown in the Rolleston Structure Plan.
- 23 Currently the land directly east of the Site is used as a training and care facility for performance horses.

Synopsis of the proposed ODP and how it relates to the neighbouring outline development plans

- 24 I have completed an analysis of the proposed ODP, the concept plan and how they align with the neighbouring ODP intentions, shown in Attachment 1.

- 25 As highlighted in the applicants' planner's report¹ The three relevant ODP's for this plan change are for DEV-RO1 (Site), DEV-RO2 and DEV-RO12.
- 26 Map 1 within Attachment 1 shows how the three outline development plans currently interact. As can be seen the various indicative road, pedestrian and cycle connections do not fully align between the three plans. However, the intention of through connections is shown in all the plans, although not to the same extent.
- 27 Map 2 shows a section of the proposed ODP and highlights how the currently consented supermarket plan affects how the Site interacts with the neighbouring outline development plans.
- 28 Map 3 shows the proposed ODP for the site in relation to the two other outline development plans. The ODP shows landscape strips along every single boundary varying in depth from 3 meters, 5 meters and 10 meters. It also shows two indicative building footprints, indicative pedestrian connections, two main entrances, five supplementary entrances, a supermarket service entrance and a future primary road connection through the Site.
- 29 Map 3 clarifies that the proposed ODP shows no intention of having other connections with the development land to the east, besides the future primary road at the southern end of the Site.

Strategic Context

- 30 Being a Tier 1 Local Authority as part of the Greater Christchurch Area Tier 1 Urban Environment, Policy 1 of the NPS-UD states that planning decisions contribute to **well-functioning urban environments**.

¹ Paragraph 4.1.1 (Private-Plan-Change-Request-Report 157-Levi-Road,- Rolleston-Part-A) page 11-13

- 31 Policy 2 of the NPS-UD directs the Council to provide at least sufficient development capacity to meet expected demand for housing and business land over the short-term, medium-term, and long-term.
- 32 Policy 6 of the NPS-UD specifically directs decision-makers to have particular regard to the planned urban form anticipated by those RMA planning documents that have given effect to the NPS-UD, and that the planned urban form in those planning documents may involve significant changes to an area.²
- 33 The NPS-UD goes further in Policy 8 where it states that: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments.
- 34 The CRPS, although a high level document, clearly directs in the objectives for Location Design and Function of Development (5.2.1).³ The CRPS directs that development is located and designed so that it achieves consolidated, well designed and sustainable growth in and around existing urban areas, provides sufficient housing choice to meet the region's housing needs, and encourages sustainable economic development by enabling businesses activities in appropriate locations.
- 35 Policy 5.3.1 of the CRPS directs towards sustainable development patterns that ensure growth concentrates or is attached to existing urban areas, encourages housing choice, recreation and community facilities, and business opportunities of a character and form that support urban consolidation. It also encourages high quality urban design including the maintenance and enhancement of amenity values.

² National Policy Statement on Urban Development 2020 (Policy 6a,b,c,d)

³ Canterbury Regional Policy Statement 2013 (July 2021 version)

- 36 Policy 6.3.2 'Development form and urban design' of the CRPS directs residential and business development to give effect to the principles of good urban design, which include: Tūrangawaewae, integration, connectivity, safety, choice and diversity, environmentally sustainable design, and creativity and innovation.
- 37 In SD-DI-01 the PODP states that Selwyn is an attractive and pleasant place to live, work and visit where development takes into account existing and anticipated character of individual communities and is well-connected, safe, accessible and resilient.
- 38 SD-DI-02 of the PODP highlights that Selwyn's prosperous economy and community wellbeing are supported through the efficient use of land, resources, and infrastructure, while ensuring existing activities are protected from incompatible activities and reverse sensitivity effects.
- 39 SD-UFD-O1 and SD-UFD-02 of the PDOP state that Selwyn shall have a well-functioning urban environment with a compact and sustainable township network.
- 40 SD-UFD-03 and SD-UFD-04 of the PDOP direct towards having at least sufficient feasible development capacity for housing and business, while managing reverse sensitivity effects and conflict between incompatible activities.⁴
- 41 The GCSP directs growth towards greater intensification in urban and town centres, and along public transport corridors. It identifies priority development areas to offer significant opportunity for change and accelerated urban development at the right scale. Rolleston town centre and the public transport corridor towards Lincoln have been identified as Priority Development

⁴ Partially Operative Selwyn District Plan (Appeals Version) SD-UFD-04.3

Areas.⁵ As can be seen in Map 4: Priority Areas for Greater Christchurch within the GCSP.⁶

ASSESSMENT

Matters to address from an Urban Design Perspective

- 42 Taking into account the statutory documents above, the key urban design matters that need consideration for this proposal from my perspective include:
- 42.1 Nearly all the strategic documents above direct planning decisions to ensure they achieve a well-functioning urban environment. Does the plan change in any way enable or prevent the Site and surrounds to operate as a well-functioning urban environment?
 - 42.2 The NPS-UD clearly directs towards ensuring sufficient development capacity for both residential and commercial activity. In my opinion, the NPS-UD promotes a balanced provision between residential and commercial. So, if additional land for large format retail is needed, is this an appropriate location from an Urban Design perspective?
 - 42.3 SD-DI-01 and SD-DI-02 and the CRPS highlight the need for taking into account existing and anticipated character of communities and existing activities are protected from incompatible activities and reverse sensitivities effects. The anticipated environment which is starting to occur at the moment is of a residential character. The character of this anticipated residential environment will depend on the level of density this site could feasibly and realistically accommodate. How does

⁵ GCSP, table 1: Priority areas for Greater Christchurch

⁶ GCSP, Map4: Priority Areas for Greater Christchurch (page 38)

the proposed plan change and associated ODP affect this character

- 42.4 The NPS-UD, the CPRS, the PODP and the urban design protocol 2005 all identify that connectivity and accessibility are of key importance for good urban design outcomes and for a well-functioning urban environment. How does the proposed plan change and associated ODP ensure a good level of accessibility and connectivity?
- 42.5 The NPS-UD, the CPRS, the PODP and the urban design protocol 2005 all direct towards urban solutions that are safe and recognize Crime Prevention Through Environmental Design (**CPTED**) principles. How does the proposed plan change and associated ODP ensure an environment that is safe from both a transport safety and a CPTED perspective?

Response to Evidence of Mr Dave Compton-Moen in relation to the topics above

- 43 Having read through the evidence of Mr Compton-Moen, I have summarised his key findings. Where he addresses the key urban design matters, I have identified above, I have highlighted to what level I agree or disagree with his findings.
- 44 Mr Compton-Moen describes the existing environment as a rural, semi-open character on the immediate fringe of suburban development. However, he also notes that because of the current MRZ zoning of the Site and surrounds, the anticipated environment will become urban in character over time.⁷As such he concludes that the receiving environment is considered to be

⁷ Para 3.1 and 3.2 of Mr Compton-Moen's Urban Design and Visual Impact Assessment

urban with any change in character assessed against the future MRZ zoning and consented Pak 'n Save supermarket.

- 45 I agree here with Mr Compton-Moen that the anticipated environment would be urban and that level of change that needs to be assessed is MRZ zoned land including the Pak 'n Save supermarket consent versus the proposed LFRZ with associated ODP.
- 46 In his assessment of effects⁸ on urban character Mr Compton-Moen considers the level of change to be of a low magnitude with the greatest change being the bulk, location and style of building which will be commercial in character.
- 47 Part of his argument for this low level of change is that it is probable that residential development would turn its back on both roads, and it would be possible that residential properties would be separated by vegetation and tall fences.
- 48 Here I disagree with Mr Compton-Moen as I consider a finer grain residential environment, even if of higher density as permitted by the MRZ zone, to be of a considerably different character to the proposed LFRZ and associated ODP.
- 49 Given the shape of the site, the minimum site size required for subdivision within the MRZ zone and the need for road and reserve space, the theoretical maximum density achievable in this location would sit just above 45 households per hectare (hh/ha) resulting in roughly 140 possible households within the site.
- 50 This maximum density is theoretical and needs to be moderated to a level that is realistic within the Rolleston context. When looking at the densities that are currently being achieved within

⁸ Paragraph 3.3 of Mr Compton-Moen's urban Design and Visual Impact Assessment

the larger subdivision areas Rolleston is seeing densities of around 19 hh/ha.

51 However, Mr Hugh Blake Manson highlights in his evidence⁹ that from an infrastructure capacity perspective Council only has allowed for a ceiling of 15 hh/ha.

52 Keeping these aspects in mind I would consider a non-fanciful density within this area would be of a maximum density of 25hh/ha. This level of density would still allow for a predominance of townhouse typologies with a mix of detached, semi-detached (duplex) and the occasional terraced housing solution.

53 I also do not agree with Mr Compton-Moen's assumptions that housing would turn its back on the street or be screened off by high fencing and planting is correct. The rules and rule requirements of the MRZ zone in my view are directive enough that residential developments are designed so that street frontages are activated and enable passive surveillance; thus, future development can be expected to have windows facing the street and tall fences along the road boundary avoided.

54 Although both LFRZ and MRZ types of development would be considered urban in character, from an urban design perspective 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. It would show a good level of diversity in urban form and planting, and it would have a good level of 'permeability'/ connectivity for both vehicles and active modes of transport. Generally an MRZ context would be much more sympathetic to the surrounding lower density urban environment.

⁹ Statement of Evidence Mr Hugh Blake Manson, Para 25

- 55 In his landscape and visual assessment, Mr Tony Milne¹⁰ highlights that 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. I do not agree with this view. As highlighted above densities of more than 25 hh/ha are unlikely to occur and most likely going to be lower. Generally, this would result in a predominance of detached and semi-detached dwellings, with the occasional terraced housing solution. There will likely be the occasional 2 storey house but not to a level that would result in a mass and built form greater than the proposed LFRZ on the Site as Mr Milne suggests.
- 56 Within the proposed rule package LFRZ-R1(PREC13), the establishment of any building or structure would be a restricted discretionary activity, with the discretion limited to CMUZ-MAT3 Urban Design. Although this would give Council a bit more certainty that a more sympathetic built-form could be expected, this built-form would be within the context of it being LFRZ not MRZ.
- 57 When comparing what type of built-form could be expected within the MRZ zone to a density as described above (25hh/ha) to a typical built-form within a large format retail zone, even with the extensive mitigation proposed by the ODP, these buildings will still have a singular, mostly blank façade arrangement, extensively using corporate colours and providing extremely low levels of glazing. Overall, it would result in an environment with a significant lower sense of human scale and amenity – otherwise anticipated in a MRZ environment.
- 58 This fact is highlighted by the significant amount of design work that has gone into the design of the Pak ‘n Save supermarket and the car parking area to make it ‘fit in’ its surrounding environment. This development needed high quality landscape strips along every boundary and a building design that shows a good level of

¹⁰ Landscape and Visual Assessment, Mr Tony Milne, page 5, paragraph 6

modulation, architectural articulation and level of glazing for a supermarket.

- 59 In addition, supermarkets generally are more attuned to residential areas and tend to be visited by local residents much more frequently. Having the local convenience of a supermarket within a residential environment often results in more people deciding to walk or cycle to the supermarket for their daily needs. If designed well, supermarkets can actually contribute to the liveliness and safety of residential environments. Whereas Trade Retail does not tend to get this frequent visitation of local residents. In addition, the goods sold generally require the use of a motor vehicle for transportation, so people tend to be prepared to travel further to use this type of service. As a result a trade retail store in my view would not have the same contributing effects as a supermarket would.
- 60 In his statement of evidence Mr Gabriel Ross raises a similar concern¹¹ regarding built-form and potential visual dominance. He suggests the need for additional assessment criteria in particular regarding the use of corporate colours.
- 61 I agree with Mr Ross that the current plan change proposal does not provide enough consideration that would result in a built form that would be sympathetic to the neighbouring residential environment.
- 62 As a minimum I would suggest that additional controls are introduced to ensure that a good level of articulation, modulation and glazing are achieved and corporate colours are actively managed to a level that is appropriate for an anticipated environment that is predominately residential.

¹¹ Statement of evidence, Mr Gabe Ross, Para 11.0

- 63 In the first paragraph of his summary of effects on visual amenity¹², Mr Compton-Moen considers the properties to the northern part of the site along Levi Road to have low visual amenity effects given the fact the consented Pak 'n Save supermarket with the extensive landscape treatment of tree and shrub planting along the boundary and throughout the car park.
- 64 From a strict visual amenity perspective, I would agree with Mr Compton-Moen concerning these properties. In addition, the trade retail store would be over 250 meters away from these views.
- 65 Regarding the effects on residents along the southwestern boundary of Lincoln Rolleston Road, Mr Compton-Moen considers the magnitude of change to be Low, Low-Moderate at a maximum. Mr Compton-Moen relies on an indicative building setback of 20 meters from the road boundary at its closest point as shown in the ODP. This in combination with the level of landscape treatment to mitigate any visual effects as shown in the visuals shown in Appendix One of his report.
- 66 I do not agree with this conclusion for various reasons:
- 66.1 First of all, the indicative footprint within the ODP is just that, indicative. A canopy structure over a supply yard can be built at significant closer proximity to the road. Up to 5 meters from the road boundary. Given the fact that the concept plan shows a canopy sitting at roughly 12.5 meters from the boundary I would say his assumption in this regard is incorrect.
- 66.2 In his evidence Mr Ross agrees with the general assessment of Mr Tony Milne that the future built form will be appropriately filtered and visually softened¹³, with the exception of the south-western interface, where a

¹² Urban Design and Visual Impact Assessment, Mr Compton-Moen, Para 3.4.1

¹³ Statement of evidence, Mr Ross, Para10.6

building or structure could be built a lot closer to the boundary which could result in a building that would be much more visually dominant.¹⁴

- 66.3 As mentioned above the design of the Pak 'n Save needed a significant amount of modulation, articulation and glazing to be acceptable and provide a sense of human scale.
- 66.4 Adding to this argument the visuals as shown in Mr Compton-Moen's report in my view show a level of screening that would not be desirable, either from a commercial or a CPTED perspective. A business of this type generally relies on visibility of a large building with corporate colours and an extensive amount of carparking clearly visible from the street. Large car parks generally are of CPTED concern. It is important to clear views of the car park area from the road and neighbouring properties from a surveillance perspective. Keeping this in mind the visual effects could be considerably higher than Mr Compton-Moen is suggesting within the visuals.
- 66.5 As I have mentioned above, residential developments will be of a much finer grain providing a high level of diversity and visual interest. Even with the matters of discretion in CMUZ-MAT3, any proposed development within the currently proposed LFRZ would result in a built-form that would be significantly bulkier and potentially dominant if built up to 5 meters from the street.
- 66.6 In addition, although softened with tree and shrub planting there is still an extensive carpark proposed along the full length of the Site along Lincoln Rolleston

¹⁴ Statement of evidence, Mr Ross, Para 11.0

Road. Where otherwise there would be residential development.

66.7 There will be a considerable level of change in this environment within the near future. However, I would consider that the difference between transferring to a non-fanciful residential environment compared to transferring to a LFRZ with the current provisions is substantial. As such, I consider that the magnitude of change between the current zone and the proposed zone to be larger than Mr Compton-Moen is suggesting, being probably moderate to high.

67 In regard to the level of visual mitigation proposed along the eastern boundary, I have relied on Mr Ross's evidence and consider a 10 meter landscape strip with the proposed level of planting to be sufficient. I also agree with Mr Ross that the lack of connectivity along this boundary could result in increased CPTED and safety issues¹⁵. Besides informal unsanctioned access the proposed 520 meter long landscape strip could also provide opportunity for concealed access into neighbouring properties. More detail about these concerns are detailed below.

68 In regard to accessibility and connectivity, Mr Compton-Moen addresses this in his assessment report in paragraph 3.4 UG-02. He considers that a high level of connectivity and accessibility is provided by providing pedestrian and cycle connections onto Lincoln Rolleston Road. I assume this is from within the Site as besides the road connection at the southern end of the Site there are no other through-connections proposed.

69 I do not agree with this point of view and do not consider access into the Site as currently shown as 'indicative pedestrian

¹⁵ Statement of evidence, Mr Ross, Para 11.7

connectivity' on the proposed ODP¹⁶, constitutes a good level of connectivity and accessibility. Although dedicated pedestrian connectivity can be a positive aspect of a development, it does need to connect to a wider network of roads and other connections. Currently the ODP only shows internal connectivity and access, hardly any through connections.

- 70 Residential environments within the MRZ generally will have a good level of permeability and connectivity as directed by the PODP and the RDDG. The PODP subdivision provisions – including objectives, policies, and rules – and the RDDG seek to achieve walkable blocks for all residential areas. To achieve this level of permeability and 'walkability', the PODP directs subdivisions to achieve walkable blocks with a perimeter of no more than 1000m¹ and a maximum length of any side of a block of no more than 250m¹.¹⁷ The RDDG goes a step further and encourages blocks with a perimeter between 600-800m¹.¹⁸
- 71 As highlighted in the three maps shown in Attachment 1, the existing outline development plans for the Site and surrounding area anticipate a good level of permeability. Although not all the indicative roads and pathways fully align, the intention is evident as all plans show road and pedestrian/ cycle connections through to neighbouring sites. As the last map in Attachment 1 shows, the proposed ODP will sever these connections, significantly reducing the level of connectivity through the Site and the wider residential neighbourhoods that adjoin the Site.
- 72 When calculating the total perimeter, based on the provided Concept Plan of the Site and taking into account the proposed road connection to the south of the Site there would be a perimeter of approximately 1330m¹. So a walkable block would be over 1300m¹. Even if we assume the neighbouring property to the

¹⁶ Appendix F- Proposed Outline Development Plan

¹⁷ PODP_ SUB-REQ7

¹⁸ RDDG_4.1 Block Design elements (page 31)

east would have a road connection along the full length of the eastern boundary, which is unlikely as it would be highly inefficient from a development perspective.

- 73 Any newly proposed residential development would need to have connections through the Site linking up with the development area to the north-east. This would provide a good level of connectivity and it would also provide opportunities for linking up with the District Park as shown in the RSP further to the north-east.
- 74 Comment has also been given regarding the positive effects of reducing the currently needed vehicle trips to Mitre 10 Hornby if a trade retail store was established on the site.
- 75 Although I would agree with this positive effect, the same could be said if a Mitre 10 was established elsewhere in Rolleston, as Mr Carr has highlighted in his statement of evidence as well¹⁹.
- 76 In regard to CPTED and safety concerns Mr Compton-Moen has addressed this to some level in his RFI response **SDC's Comment 1.4.**
- 77 In regard to the 520 meters long landscape buffer and possibility for concealed access into neighbouring properties, Mr Compton-Moen considers that because there is no public access and the area is fenced off, people will not try to gain access. In addition, he considers that because the service area is elevated people will have views into the area and as such this is addressed from a surveillance perspective.
- 78 I do not agree with this perspective as fences that solid are not actually a good deterrent for anti-social activity (it actually exacerbates it if not visually permeable) and when one has

¹⁹ Statement of evidence, Mr Carr, Para 2.58

entered the extensive landscape strip, one would have a good level of concealment.

- 79 I would agree about the level of surveillance during opening hours of the retail stores and if not concealed by some of the fencing. However, after closing hours, when it is more likely criminal activity and undesirable behaviour would occur, there is no longer any such surveillance.
- 80 When looking at the wider site, the proposed land-use and the level of connectivity resulting from the proposed ODP, I believe there are more CPTED concerns than just the landscape strip along the north-eastern boundary.
- 81 Because of the proposed activity (LFR) there will be no residential activities on the Site, so no internal surveillance, no passive surveillance and no stewardship over the area of the Site from residential properties after closing hours of the trade retail store and the supermarket. There might be some surveillance from neighbouring properties, but their outlook is a large car park softened by landscape strips.
- 82 There is an extensive amount of car parking proposed along the full length of Levi Road and Lincoln Rolleston Road. Car parking areas that are not well overlooked and do not have a significant amount of lighting tend to attract criminal activity and undesirable behaviour. The extensive screening of the site as shown in Mr Compton-Moen's visuals is actually undesirable in this regard and would cause safety issues.
- 83 Large parts of the parking area are well over 70 meters away from any residential property and even when considering the supermarket from the adjacent footpath. 70 meters is generally the maximum distance you can still discern what activity is occurring. Beyond 70 meters of distance it becomes increasingly hard to distinguish any particular kind of activity, increasing the risk of undesirable behaviour after closing hours of the retail stores.

- 84 Overall, I consider there are quite a few CPTED risks associated with the current proposal that have not been sufficiently addressed.
- 85 When looking at the current safety concerns and the level of connectivity and accessibility provided in the proposed ODP, I consider this proposal would not result in achieving a well-functioning urban environment.
- 86 I believe an additional connection is needed across the north-east boundary. Mr Ross and Mr Carr consider this connection could be a walking and cycling link²⁰. From a connectivity perspective (walkable block) I would agree with Mr Ross and Mr Carr, however from a CPTED perspective an actual road connection with associated footpath would be a much better outcome. It would provide more activity along this road (eyes on the street) and it would break-up the extensive car parking area.
- 87 Another issue with visibility of the car park would be lighting. It will be important to ensure an even spread of lighting is achieved across the car park area and 'dark spots are avoided'
- 88 To ensure these aspects are taken into account and can be easily assessed at the time an application for resource consent is submitted, I consider there is a need to include the requirement for a full CPTED assessment as part of any resource consent application.
- 89 In regard to the appropriateness of rezoning the Site to LFRZ – while it sits within a MRZ residential environment, it is important to consider how much need there is for land for this specific type of commercial activity within the wider Rolleston urban area and in this specific location. In his statement of evidence Mr Derek Foy highlights there is sufficient industrial land available to

²⁰ Statement of evidence, Mr Ross, Para 11.8 and statement of evidence, Mr Carr, Para 2.51

accommodate a Mitre 10, however he agrees a location within the available industrial areas would be inferior to the Site location.²¹

90 Another matter to consider is if the loss of 'residential zoned land' would result in an overall adverse impact on the future urban residential capacity for Rolleston? The NPS-UD directs towards having at least sufficient capacity of both commercial and residential zoned land. In his evidence Mr Foy clearly states there is sufficient residential capacity in other locations to ensure Council meets its obligations.²²

91 Taking both aspects into account I would consider that although the Site would commercially be a superior location for a Trade Retail Store, from an Urban Design perspective there is no need for this area to be rezoned to LFRZ as there is sufficient suitably zoned land elsewhere.

RESPONSE TO SUBMISSIONS

92 Having read through the submission there seems to be overall support for a Mitre 10 to be located in Rolleston. However, there are views in support of and in opposition to this specific location.

93 Submitters²³ who are in support of this location, prefer it over having to travel to Christchurch and some prefer it over the LFRZ or the General Industrial Zone (**GIZ**). Arguments made are reduction in travel distance for people in Rolleston and the opportunity for employment. Submission 8 even goes as far as stating residential is no longer compatible with the supermarket activity.

94 Although I would agree with the benefits of having a trade retail store within Rolleston to reduce travel times and provide

²¹ Statement of evidence, Mr Foy, Para 3.30-3.31

²² Statement of evidence, Mr Foy, Para 3.24

²³ Submission 1,2,7-13, 16-18, 20, 22,23

opportunities for employment, unless there is a clear shortfall in commercial land for this activity, I would consider a different location like the LFRZ or the GIZ would be more appropriate.

- 95 Submitters who are opposed²⁴ to the plan change generally consider it should move to the LFRZ or the GIZ. A few are mostly concerned with traffic effects on the surrounding environment however some are also concerned about liveability, amenity and visual impacts on the residential area.
- 96 From an urban design perspective I would agree with some of the traffic related effects highlighted. Although I cannot address the transport effects of additional traffic in a neighbourhood and Mr Carr has addressed this in his evidence²⁵, from an urban design perspective having less traffic in residential environments would generally ensure a higher level of amenity is achieved or maintained.
- 97 Regarding the effects on character, safety, connectivity and the visual effects on neighbouring properties, I would agree with these submitters that this type of commercial activity causes significantly more friction if located within a residential environment compared to a LFRZ or GIZ. The proposed ODP and provisions in my view do not sufficiently address concerns about visual amenity, character, CPTED and connectivity.
- 98 Some concerns can be addressed by ensuring an appropriate road connection is introduced across the north-east boundary and additional controls regarding setbacks, and built form are added to the proposed rule package.

²⁴ Submission 3-5, 14, 15, 21

²⁵ Statement of evidence, Mr Carr, Para 3.6-3.8

CONCLUSION

- 99 The economic evidence provided shows that from a commercial perspective this Site is superior to establish a trade retail activity in comparison to the other areas of land that are zoned appropriately for this type of activity. However, from an Urban Design perspective, I do not consider that this location would be appropriate.
- 100 Having, considered the strategic framework as identified in my evidence above and having responded to the urban design assessment by Mr Compton-Moen and the views of the various submitters, I am of the view that in its current form a rezoning to LFRZ with the proposed ODP and associated provisions, to establish a trade retail activity, would not be appropriate from an Urban Design Perspective.
- 101 The change of character arising from rezoning the Site from MRZ (including the consented supermarket) to LFRZ in my view is significant. I do not consider landscape mitigation alone can sufficiently addresses this, particularly not along the south-west corner. In that respect I do not have the same view as Mr Compton-Moen.
- 102 Some of the concerns can be addressed by increasing the building setback from the road to 20 meters and introducing additional controls to ensure a good level of articulation, modulation and glazing are achieved on any new building or structure. Concerns about corporate colours could be addressed by restricting the use of these colours to a level that is appropriate for an anticipated environment that is predominately residential.
- 103 I also do not agree the level of connectivity resulting from this plan change would be sufficient, in particular when considering the need for having walkable blocks within a residential environment. From a connectivity perspective an additional link would be needed connecting Lincoln Rolleston Road with the neighbouring development site along the north-east boundary.

The most logical location would sit somewhere between where the two retail buildings are currently indicated. From a CPTED perspective this should be a road with associated footpaths.

104 I do not consider this plan change sufficiently addresses CPTED concerns, and more consideration is needed to ensure a safe environment for the surrounding residential area. The following aspects would need to be considered:

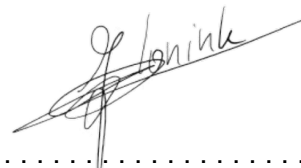
104.1 Restrictions on planting along the Road Boundaries to get the right balance between landscape softening and visibility of the car park.

104.2 A road connection through the site could address some of the CPTED concerns regarding visibility and passive surveillance of the car parking area after closing hours. This road connection would also assist with breaking up the extensive amount of car parking along Lincoln Rolleston Road.

104.3 I would recommend a specific requirement to provide a full CPTED assessment, including a lighting plan, as part of any resource consent application.

Date

20 February 2024



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John Lonink

APPENDIX ONE: ODP MAPPING

Attachment 1- Map 1

Existing ODP combined

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0 0.1 0.1 0.2 0.3 Kilometres

Scale: 1:5,000 @A3

Map Created by Canterbury Maps on 29/01/2025 at 3:31 PM



Attachment 1- Map 2

Currently anticipated ODP environment

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0 0.1 0.1 0.2 0.3 Kilometres

Scale: 1:5,000 @A3

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Attachment 1- Map 2

Proposed ODP environment

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0 0.1 0.1 0.2 0.3 Kilometres

Scale: 1:5,000 @A3

Map Created by Canterbury Maps on 29/01/2025 at 3:31 PM

