

Before a Commissioner
appointed by Selwyn District Council

Under the Resource Management Act 1991

In the matter of an application by Paul Johnstone to subdivide an existing 1 ha property located at 28 Manse Road Leeston into four lots being Lot 1 (2,000 m²), Lot 2 (3,050 m²), Lot 3 (3,042 m²) and Lot 8 (2,000 m²)

Statement of evidence of Michael Benjamin Carvalho Vincent

1 July 2020

Qualifications and experience

- 1 My name is Michael Benjamin Carvalho Vincent and I am a resource management consultant for Baseline Group, an independent, specialist land development consultancy with three offices throughout New Zealand. I hold the Degree of Bachelor of Resource Studies from Lincoln University and I am a full member of the New Zealand Planning Institute.
- 2 Experience of particular relevance to this application includes preparation of resource consent applications including assessments of environmental effects for large and small subdivisions, and residential, rural and commercial land uses.
- 3 I have been involved with the proposed subdivision consent application from January 2020 when it was first lodged. I attended a meeting with Council planning staff to discuss the application. I prepared the assessment of environmental effects (AEE) report that accompanied the resource consent application lodged in January 2020.
- 4 In preparing this statement of evidence I have considered the following documents:
 - (a) The section 95e Planning Report
 - (b) The section 42A report prepared by Ms. Jane Anderson on behalf of the Council
 - (c) The two submissions made to the application.
- 5 My evidence addresses planning related elements of the Application.

Code of Conduct for Expert Witnesses

- 6 While this is not a hearing before the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2014 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope of evidence

- 7 In this evidence I focus on the following matters:
 - (a) A summary of the proposed site, context and proposal.
 - (b) The Statutory planning provisions and criteria applying or relevant to the proposal

- (c) An assessment of environmental effects of the proposal
- (d) Relevant plans and policies
- (e) Other Relevant Sections 104 Considerations
- (f) Response to submissions
- (g) Part 2 matters.

Summary

- 8 This subdivision application relates to a 4 lot subdivision at 28 Manse Road, Leeston. The area under application has an area of 1 ha, that being Lots 1 – 3 of RC 165456.
- 9 The proposal requires consent for a breach in density for the Living 2 zone with the activity status being non-complying. This matter has been addressed in the original application and supporting planning evidence.
- 10 The application is not supported by the Council's consultant planner, who has recommended declining of the application in particular due to resultant adverse effects related to residential density and character and amenity, traffic effects and servicing when considering the non-adjacent environment.
- 11 Overall due to the particular characteristics of the surrounding environment, the design of the allotments and the positive effects anticipated from the proposal, I consider the effects will be no more than minor as a result of the proposal.
- 12 I have undertaken an assessment of the relevant objectives and policies of the Selwyn District Plan and consider the proposal to be consistent with these provisions.
- 13 Two submissions have been received. One in opposition and the other neutral. These matters have been discussed in the Council report and in this brief of evidence.
- 14 In overall terms, I consider that the adverse effects on the environment of the proposal will be no more than minor and the proposal is consistent with the relevant Selwyn District Plan provisions.
- 15 In my opinion, there will be positive effects associated with the proposed subdivision, including a more efficient use of natural and physical resources. For these reasons, I consider that the granting of consent would be consistent with the enabling provisions of Part 2 of the Act and the section 104D gateway tests.

SITE, CONTEXT AND PROPOSAL

- 16 The site and context are set out in Section 2 of my original application. I adopt this description for the purpose of this evidence. For clarity the vehicle access to the site will be vested as road with Council.
- 17 The proposal is set out in Section 3 of my original application. I adopt this description for the purpose of this evidence.
- 18 Since lodgement, a landscape plan has been provided, taking into account the request from Council, to illustrate the location of planting. A landscape plan is now included within the application and plan shows the proposed species of planting on the southern (next to cul-de-sac) and western boundaries of Lot 8. This has not been included within the Section 42A hearings agenda documents but is attached to this brief of evidence. The implementation of the landscape plan is offered as a condition of consent.

CONSENTS REQUIRED AND APPLICATION STATUS

- 19 The reasons for consent are set out in paragraphs 4 and 5 of Ms Anderson's report in the Hearing Agenda. I have reviewed these matters and generally agree with them.
- 20 I agree that the proposal is a non-complying activity in terms of the Selwyn District Plan Rule 12.1.7.1.

STATUTORY CONTEXT

- 21 Being a non-complying activity, and pursuant to Section 104D of the RMA, the gateway test relating to the whether or not the proposal may be approved are;
- (a) *The adverse effects of the activity on the environment (other than any effect to which section 104(3)(a)(ii) applies) will be minor; or*
 - (b) *The application is for an activity that will not be contrary to the objectives and policies of:*
 - (i) *the relevant plan, if there is a plan but no proposed plan in respect of the activity; or*
 - (ii) *the relevant proposed plan, if there is a proposed plan but no relevant plan in respect of the activity; or*
 - (iii) *both the relevant plan and the relevant proposed plan, if there is both a plan and a proposed plan in respect of the activity*

- 22 The site is zoned Living 2, Leeston, with the subdivision provision in the District Plan set at restricted discretionary status, at an average of 5,000 m². A subdivision where the minimum average net is less than 5,000 m² is a non-complying activity and is subject to the gateway test of s104D of the RMA. Should it pass those tests, the requirements of Section 104(1) where subject to Part 2, regard is to be had to:
- (a) *Any actual and potential effects / the environment of allowing the activity;*
and
.....
 - (b) *Any relevant provision of –*
.....
 - (v) a regional policy statement;*
 - (vi) a plan or proposed plan; and*
 - (c) *Any other matters the consent authority considers relevant and reasonably necessary to determine the application.*
- 23 The High Court¹ has noted none of the matters listed has more or less weight than the other and that the “absence of adverse effects was not determinative, and that enquiry should be made whether the proposal would achieve the objectives of the plan”.

ASSESSMENT OF OBJECTIVES AND POLICIES

- 24 The Selwyn District Plan Township Volume uses a strategy to control residential density. The strategy broadly seeks:
- (i) *The Plan provisions provide for a range of section sizes in Living zones by having an average lot size, not a minimum.*
 - (ii) *Spaciousness is managed through site coverage (small section/small house; large house/large section).*
 - (iii) *Density in Living 2 and 3 Zones is kept low thus reflecting the rural character by maintaining a sense of open space, panoramic views and rural outlook.*
- 25 The strategy is implemented through Objective B4.1.1, Objective B4.1.2, Policy B4.1.1 and Policy B4.1.2. Of particular relevance to this proposal is Policy B4.1.2 which speaks directly to the Living 2 zone.

¹ *Stirling v Christchurch City Council (2011) 16 EL RNZ 798 (HC)*

Living 2 zone

- 26 The Living 2 zone is not specifically defined by the plan, but Policy B4.1.2, which provides the most direct reference to the zone, states the intention is that it retains:
- *“Living 2 and 3 Zones areas with lower residential density than Living 1 Zones”.*
 - *“The policy refers to ‘considerably lower’ which acknowledges that low density living zones be spacious and reflect something of the rural characteristics in which they are located. Currently they are from 6 to 12 times lower”.*
 - *“The Council suggests average section sizes would need to remain between 3 and 6 times lower in the Living 2 Zone and between 6 and 10 times lower in the Living 3 Zone than that of Living 1 Zones, to have a visually discernible difference in residential density”.*
- 27 Given this, the direction from Council is to allow for consideration of section sizes in the Living 2 zones being between 3 and 6 times lower than Living 1 zones. It would follow that anything within this range would exhibit a visually discernible difference in residential density and satisfy the expectation of the residential strategy.
- 28 Numerically, this translates to sites being between 1,950 m² and 3,900 m² in order to create a discernible difference between the Living 1 and Living 2 zones. This proposal seeks to create Lots which are between 2,000 m² and 3,050 m² net, which in my evaluation, illustrates the proposal is numerically within the expected range as sought by Council.
- 29 The Policy explanation surmises a change in density does not equate to an adverse effect on amenity values. The amenity values associated with this proposal are enhanced through the proposed landscape plan which will have the effect of reducing the dominance of the buildings erected in the sites. The landscaping will provide screening from the prevailing southerly wind whilst preserving the spacious outlook to the north from the respective allotments. It also serves as a natural visual boundary between the development on Showground Place. Consequentially I am of the view that the proposal, with respect to residential amenity, is not incongruous with the expectations of the Policy.
- 30 By allowing allotment sizes within the expected range (3 to 6 times), this will allow them to be not only maintained more readily but is a more efficient use of land. I note the area is fully serviced with reticulated wastewater and potable water supply. I consider this is a more efficient use of land to allow more dwellings to connect to existing council infrastructure. This brings down the collective cost of servicing across the District.

- 31 The proposed allotments would also make more efficient use of water resources. In this sense, despite the establishment of another dwelling, the use of water as a resource is directed to human consumption, rather than servicing a landscaped grass environment, which may otherwise have been representative in a larger sized allotment. In my assessment this is a pertinent and appropriate response to the future of the environment.
- 32 Objective B4.1.1 and B4.1.2 seeks a range of living environments whilst maintaining the overall 'spacious' character of townships and ensuring amenity values of townships. In my opinion the proposal demonstrates this by achieving a range of allotments at different sizes whilst retaining something of the rural character, close to the township amenities, which is otherwise unavailable in Christchurch.
- 33 Objective B4.1.2. notes that particular regard should be had to reducing the potential for reverse sensitivity and providing a buffer between the rural area proper and more concentrated township area.
- 34 The wider application site adjoins the Ellesmere A & P Showgrounds on the north-eastern boundary. The Showgrounds have an area of approximately 31 hectares and although zoned Rural does not operate as a typical rural activity² as there primary purpose is related to operations of the Ellesmere A & P society as opposed to the rearing of crops or livestock and associated vehicle movement.
- 35 If new residential activities are allowed to establish in close proximity to existing rural zones, new residential users may have expectations that are not meet by an active rural activity. As a result, complaints could arise due to the lawful effects of the adjoining activity.
- 36 Through RC165456 there are already two recently consented allotments directly adjoining the site and a further two between the application site and the Showgrounds. It is clear through the creation of these allotments that reverse sensitivity in this environment has been assessed and deemed to be no more than minor in relation to the rural interface.
- 37 This proposal does not increase the number of allotments that directly interact with the rural interface. The proposal does not increase the number of people exposed to the rural interface beyond that which has been previously consented.
- 38 It is acknowledged that the environment will change from the existing undeveloped state and will introduce fenced sections and modern dwellings. However, these

² *Rural activity: means the use of land or building(s) for the purpose of growing or rearing of crops or livestock, including forestry, viticulture and horticulture and intensive livestock production and may include a dwelling*

changes will also occur within the context of the consented allotments and will contribute to the buffer of 100 m distance between the Showgrounds and proposed Lot 1. Any additional planting as proposed by the landscape plan would provide further mitigation within the environment.

- 39 In my opinion there is sufficient support in the District Plan's policy framework for a subdivision development of this nature. In short, the proposed subdivision avoids adverse effects on amenity values and maintains a spaciousness environment. It is consistent with Policy B4.1.2 which gives effect to Objectives B4.1.1 and B4.1.2. It is not contrary to the other Objectives and Policies in the Plan. The proposal is inconsistent with the subdivision table C12.1 allotment sizes but is able to meet the provision within this specific zone. In this regard it is able to pass through one of the Gateway tests.

SECTION 104 ANALYSIS (1)(A) – ACTUAL AND POTENTIAL EFFECTS

- 40 As a non-complying activity, all effects associated with the proposal, including positive effects, are subject to scrutiny.
- 41 I prepared the assessment of effects which was submitted with the original application. The application addresses the following matters:
- (a) Rural character and amenity effects
 - (b) Visual effects
 - (c) Positive effects
- 42 After attending a preapplication meeting with Ms Anderson, and following review of the s42A report, there remains a degree of contention on the scale and extent of the effects. This section of my evidence focuses on those effects along with the positive effects of the proposal. Matters raised by submitters are addressed later in my evidence.

ASSESSMENT OF ENVIRONMENTAL EFFECTS

Permitted Baseline

- 43 The Selwyn District Plan (Township) does not provide for permitted or controlled subdivision, and no permitted baseline comparison has been undertaken for the purpose of the subdivision.
- 44 However, extrapolating from the concept, in a hypothetical sense, the Living 2 zone east of Manse Road has yield capacity of 64 allotments, should it be subdivided all at once. I recognise this is not represented through this application, and do not seek to assert this as a permitted baseline concept in this body of evidence.

Through this proposal I have sought to illustrate the potential of the zone to be developed at the proposed capacity. The application, as prepared, shows existing landowners would not lose their ability to develop should they choose to do so, and this evidence seeks to highlight this through the policy framework and effects which are no more than minor.

Existing environment

- 45 The existing environment is characterised by a range of residential allotments of varying sizes with a regular rectangular shape. To the west of Manse Road (Living 1 and XA), the environment is distinctly urban, with fully serviced residential dwellings and allotments ranging in size from 800 m² to 1.424 ha³. However the property located at 25 Cunningham Street (1.424 ha) does not present an accurate reflection of the environment and skews the square metre average for the area as the site is unavailable for development due to the Health Board designation. I agree with the Planning Officer's assessment of the median figure across the Living 1 and Living XA zones being more or less 1,018 m², which in my opinion is a fair representation of the historic establishment of that environment.
- 46 East of Manse Road the density decreases as land use / zone accommodates dwellings with larger footprints relative to site coverage as well as additional utility buildings, grass and landscaping and shelterbelt trees.
- 47 In a visual sense the existing environment is viewed primarily from Manse Road, which has Living 1 on the west side and Living 2 on the east side. Manse Road provides further delineation by virtue of the stormwater drainage system with both a swale and domestic kerb and channel on the west side and typically rural drains on the east side. These utility features provide visual cues to the intended change in density from an urban to a less dense environment.
- 48 The application site is positioned up a new road and is somewhat hidden from immediate view and would not be visually obvious from Manse Road. It may also be possible to view some of the allotments from Friars Lane which is classified as road.

Neighbourhood and Residential amenity

- 49 The planning report makes an assertion to the creation of 'undersized' allotments. In my assessment the Selwyn District Plan does not describe nor define 'undersized' nor 'oversized' allotments. The provisions of the plan seek to ensure an 'average' allotment size is met across a zone. In my opinion the Living 2 zone

³ Currently owned by Canterbury District Health Board and has a designation across it. Should the designation be uplifted, the site would be eligible for 650 m² average allotments given the Living 1 zoning.

does not have a minimum lot size and therefore cannot have 'undersized' allotments. In this regard the proposal has not created 'undersized' allotments.

- 50 Density is not an effect on the environment; however, I regard it to be a component of amenity⁴. In this context the Plan does not provide a concise definition of either high or low density to assist users of the plan. Rather it provides a definition of 'medium density'⁵. It also describes rural residential activities occurring within the Living 3 zone being between 1 and 2 house per hectare. These definitions, in my opinion, establish a de facto hierarchy with low density being greater than 550 m² and rural residential is greater than 5,000 m².
- 51 The proposal will increase the density of the subject site, but I cannot agree with the planning report that the increase in density will result in a more urban character. The site will maintain an open and spacious typology with sites being between 2,000 m² and 3,050 m². These sizes will retain the opportunity for extensive tree planting and landscape vegetation to be established, which will provide amenity values to the site. In fact, it is likely more vegetation will be established on the boundary edges of the allotments as allotments of this kind are often planted with shelterbelt vegetation for privacy and to act as a wind break from prevailing winds.
- 52 Policy B4.1.2 speaks directly to the Living 2 zone and discusses the density requirements of Living 2 by stating:
- *"The policy refers to 'considerably lower' which acknowledges that low density living zones be spacious and reflect something of the rural characteristics in which they are located. Currently they are from 6 to 12 times lower".*
 - *"The Council suggests average section sizes would need to remain between 3 and 6 times lower in the Living 2 Zone and between 6 and 10 times lower in the Living 3 Zone than that of Living 1 Zones, to have a visually discernible difference in residential density"*
- 53 It is evident that Council believe that the Living 2 zone is too large, despite putting 5,000 m² in the Plan in the subdivision standards for Leeston, without clearly stating why. In this regard the Rule Table is not consistent with the policy direction.
- 54 The adjoining Living 1 zone, west of Manse Road, requires an average of 650 m². When considered mathematically, the plan is suggesting that sites can be between 1,950 m² and 3,900 m² to create a discernible difference in residential density. The

⁴ Section 2 RMA: means those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.

⁵ Medium density: means residential development at a higher density than standard low-density residential development of detached dwellings on sections typically larger than 550m²

proposal seeks to create Lots which are between 2,000 m² and 3,050 m² net. Therefore, the proposed allotment sizes are entirely consistent with those anticipated for the Living 2 zone under Policy B4.1.2.

- 55 The planning report describes the proposal as creating a pocket of 'higher density' living within an area of low density, semi-rural living. The District Plan does not describe the Living 2 zone as being semi-rural. The District Plan does not describe semi-rural either. However, in my view the proposal is in general accordance with the intention of the policy which allows for residential density being visual discernibility at 3 to 6 times lower than Living 1 zone and consequentially any adverse effects are considered to be anticipated by the Plan.

Amenity

- 56 In my opinion, and in this circumstance, the act of subdivision is unlikely to have little in the way of actual effects on the environment. However, the Plan notes the expectation that if an allotment is purchased, it can be built on – especially in townships. Therefore, in this regard the consequence of subdivision needs to be taken in to account and those consequences represent a potential effect in terms of s104(1)(a).
- 57 In this situation the creation of one additional allotment is unlikely to have adverse effects on the rural interface as none of the proposed allotments adjoin the Rural zone to the north which, in this instance, takes the form of the Ellesmere Agricultural and Pastoral Showgrounds (A & P Grounds) which has been there for over a century.
- 58 For clarity, as a result of RC165456 there are two consented lots that adjoin the rural 'interface' being Lots 6 and 7 of RC 165456. There are two further allotments, Lots 4 and 5 of RC 165456, which when combined with Lots 6 and 7 add over 100 m distance to the adjoining rural zone, from proposed Lots 1, 2 and 3. I consider any amenity effects are concentrated on proposed Lot 1 and neighbouring Lots 5 and 6 from the neighbouring subdivisions at Showground Place.
- 59 The neighbouring allotments were specifically notified of the proposal and no submission has been received from them. I can only conclude from this, that they did not consider themselves to be affected by this proposal. Further the proposed landscape plan will ensure a vegetative boundary between their allotments, the Road and the proposed development. The proposal is unlikely to have effects on the wider environment due to the uniform pattern of development and compatibility with the surroundings, and the ability to control spaciousness through site coverage. In my opinion the amenity effects are no more than minor and in general accordance with the residential strategy of the Plan.

Contamination effects

- 60 Under RC165456 the site has been appropriately remediated. There are no contamination effects.

Effects on ecosystems

- 61 Given the activity is taking place on residentially zoned land that does not have any significant ecosystems it is considered there are no effects on ecosystems.

Effects on Natural and Physical resources

- 62 It is considered the proposed activity will not have any effects upon the value of any natural or physical resources.

Cumulative effects

- 63 In my opinion there is a contradiction between the policies and the expectations of the rules within the plan which could lead to the potential for cumulative effects. I accept that the proposal will decrease the average lot size and increase the density in the Living 2 zone, however within the context of the site and the policy framework the plan allows for, and makes provision for this type of effect. Consequentially the increase in the number of lots puts pressure on infrastructure, upgrade to roading and servicing. In this situation, the proposal will be fully serviced, the accessway will be upgraded to District Plan standards and vested as road with Council. It will also provide lot sizes which are anticipated by the policy framework. In this regard I consider the cumulative effects to be no more than minor.

Positive effects

- 64 In my opinion the proposal will enable a range of allotment sizes in a residential zone. The rectangular typology of these lots will be similar to the existing typology. The site is fully serviced and within the boundaries of the township. The allotment sizes will provide more manageable grounds, whilst maintaining an open and spacious environment. I conclude the creation of these allotments will have effects which are no more than minor and are able to meet the section 104D gateway test.

Precedent and plan integrity

- 65 I have considered whether this proposal will set a precedent, whether precedent is an adverse effect on the environment. It is my understanding that precedent in itself is not an adverse effect on the environment but is something that can be taken into consideration under section 104(1)(c) of the Act, dependent on the circumstances.

- 66 In my opinion precedent can be set when a consent authority resets the expectations of the public following the granting of a resource consent that should otherwise not have been anticipated in a zone. In my opinion this situation does not apply to this application, as this proposal is supported by the objectives and policies of the plan. In this regard, rather than setting a precedent, the proposal highlights a conflict between the policy framework and zone rules.
- 67 It is typical of planning documents to set a more stringent rule threshold than is actually allowable through a consent application. This is the purpose of applying for a consent i.e. to enable a proposal that fails to meet a rule to be considered on its merits and assessed against the direction and provisions of the plan. This proposal is not immediately permitted by the rules. As such the non-complying activity status requires an assessment against the objectives and policies to determine if it meets one or both of the section 104D threshold tests. In my opinion, the policy framework allows for section sizes of between 1,950 m² and 3,900 m² in this zone. Therefore I conclude this application does not set a precedent, rather is allows for a section to be created as anticipated by the framework of the Plan, although not immediately permitted by a rule.

Reverse Sensitivity

- 68 The section 42A report touches on the matter of reverse sensitivity, referencing concern for an increase to the number of allotments located at the rural interface and the number of people exposed to potential reverse sensitivity effects. However as discussed previously there is over 100 m distance from the immediate nearest rural boundary and the proposed allotments. Given the A & P Showgrounds do not operate like a typical rural activity, and their activities do not have the frequency, intensity or scale when compared to a typical rural activity, reflecting a unique environment.

RELEVANT PLANS AND POLICY STATEMENTS

Operative regional policy statement

- 69 The proposal is not considered to be at a scale or size that challenges the provisions of the Canterbury Regional Policy Statement (RPS).

MATTERS RAISED BY SUBMITTERS

- 70 Two submissions were received, one in opposition and the other neutral.
- 71 Mr Craig Perkins raised concerns regarding his property at 6A Friars Lane. We respect Mr Perkins' due diligence and concern about a reduction in character and amenity. I respectfully note there is a consented environment that would present a similar environment to the one currently proposed. To this extent there

will be two residential dwellings established within the first 80 metres of proposed Lots 1 and 8. In my opinion an additional residential dwelling would be barely discernible at this distance. In addition all allotments will be subject to the site coverage rules of the District Plan that allow for the lesser of 20% of the site or 500 m², and minus 36 m² when establishing a garage. Given this, and the previous assessment, I believe the concerns of Mr Perkins are able to be managed through the provisions of the Plan.

- 72 Mr Andre Goldsmith made a neutral submission concerned with increased ground levels and inappropriate use of the accessway. I agree with the assessment of Ms Anderson detailed in paragraphs 46 and 48 and the applicant is able to discuss these matters with Mr Goldsmith.
- 73 In regard to the inappropriate use of the accessway, the site will be accessed from a public road vested in Council, it is not considered that this can provide the outcome that Mr Goldsmith seeks.

PART 2 OF THE RMA

- 74 Part 2 contains the purpose and principles of the RMA. Section 5 is enabling and provides for people and communities to provide for their social, economic and cultural wellbeing whilst safeguarding resources for future generations and avoiding, remedying and mitigating adverse effects on the environment.
- 75 The proposal will enable the owners of the land involved in the application to meet their needs without compromising the ability of others to meet their needs, whilst avoiding, remedying, or mitigating any adverse effects of activities on the environment. To this extent the proposal will mitigate any adverse effects on the environment by providing vegetation and ensuring an allotment size 3 to 6 times greater than the Living 1 zone.
- 76 The remainder of Part 2 sets out matters of national significance, other particular matters that need to be considered, and Treaty of Waitangi considerations. No cultural matters arise in the consideration of this application.
- 77 In regard to Section 7, the relevant matters include:
- (b) the efficient use and development of natural and physical resources:*
- (c) the maintenance and enhancement of amenity values:*
- (f) maintenance and enhancement of the quality of the environment*
- 78 The proposal represents an efficient use and development of natural and physical resources of as it will enable the creation of four residential allotments for residential purposes, within an existing serviced area of Leeston. The proposed

allotments size will maintain a density lower than the Living 1 zones in the township maintaining and enhancing the spacious and open semi -rural setting.

Conclusion

- 79 Overall, I consider that the proposed development represents a sustainable use of land, within the capacity of the surrounding environment, and without compromising the ability of the owners and occupiers of surrounding properties and the community to provide for their social, economic, and cultural well-being.
- 80 The proposal, in my view, will provide much needed variation of allotment sizes in an area which is in close proximity to Leeston Town Centre.

A handwritten signature in black ink, reading "M. Vincent". The signature is written in a cursive, flowing style.

Michael Vincent

Dated this 1 day of July 2020

1. Attachment: Landscape Plan dated 12 February 2020.



Landscape Plan
Scale 1: 200 @A1

Site Location Plan
Scale 1: 1200 @A1



3
3042m²
+ ROW
3141m²

2
3050m²
+ ROW
3170m²

5
2539m²
+ ROW
2814m²



Landscape Strip Plant: evergreen low hedge approximate growth to 3m x 3m when mature (may need regular trim)
Suggested species: *Corokia spp*, *Coprosma spp* or other similar feature hedges

<i>Corokia buddlejoides</i> 'Korokio'	Mature height/ spread: 2m x 3m Evergreen/ Grade: 10L	Total 58
<i>Coprosma Crassifolia</i> 'NZ Coprosma'	Mature height/ spread: 2m x 4m Evergreen/ Grade: 10L	Total 58

28 Manse Rd, Leeston			
Scale	Refer to Plans		
Date	12 Feb 2020		
Design			
Drawn	EL		
Review	MV		
Rev.	Date	Amendment	
Revision			
Sheet	1		