

BEFORE THE SELWYN DISTRICT COUNCIL HEARINGS COMMISSIONER

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of subdivision and land use consent applications by Kevler Development Ltd

RC225715 & RC225716

EVIDENCE OF DAVE COMPTON-MOEN
Dated 10 July 2023

Christchurch
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A handwritten signature in dark green ink that reads "Anthony Harper". The signature is written in a cursive, flowing style.

1 QUALIFICATIONS AND EXPERIENCE

- 1.1 My full name is David John Compton-Moen.
- 1.2 I am a Director at DCM Urban Design Limited, which is a private independent consultancy that provides Landscape and Urban Design services related advice to local authorities and private clients, established in 2016.
- 1.3 I hold the qualifications of a Master of Urban Design (Hons) from the University of Auckland, a Bachelor of Landscape Architecture (Hons) and a Bachelor of Resource Studies (Planning and Economics), both obtained from Lincoln University. I have been a Registered Landscape Architect of the New Zealand Institute of Landscape Architects('NZILA') since 2001, a full member of the New Zealand Planning Institute since 2007, and a member of the Urban Design Forum since 2012.
- 1.4 I have worked in the landscape assessment and design, urban design, and planning fields for approximately 25 years, here in New Zealand and in Hong Kong. During this time, I have worked for both local authorities and private consultancies, providing expert evidence for urban design, landscape and visual impact assessments on a wide range of major infrastructure and development proposals, including the following relevant projects:
- (a) 2021 – Working for Waimakariri District Council, I prepared Urban Design evidence to assist with Private Plan Change 30 – Ravenswood Key Activity Area (KAC) which sought to rezone parts of an existing ODP to increase the amount of Business 1 land and remove a portion of Residential 6A land.
 - (b) 2020-21 – Working with Waimakariri District Council to assist with developing structure plans for Kaiapoi, Rangiora Northeast, Rangiora Southeast and Rangiora West.
 - (c) 2020-21 – Working for Mike Greer Homes, I have worked on the master planning, urban design and landscape design for the following Medium Density Residential and Mixed-Use Developments:
 - (i) 476 Madras Street – a 98-unit residential development on the old Orion Site.
 - (ii) 258 Armagh Street – a 33-unit residential development in the inner city.
 - (iii) 33 Harewood Road – a 31-unit development adjacent to St James Park in Papanui.

- (iv) 2020-21 – Working with Waimakariri District Council, I have assisted with the development of four structure plans for future urban growth in Rangiora and Kaiapoi.
- (e) 2020-22 – Working for several different consortiums, I have provided urban design and landscape advice for the following recent private plan changes in the Selwyn District:
 - (i) Lincoln South, Lincoln
 - (ii) Southeast Rolleston, Rolleston
 - (iii) Birchs Village, Prebbleton
 - (iv) Extension to Falcons Landing, Rolleston
 - (v) Rolleston Southeast
 - (vi) Holmes and Skellerup Block, Rolleston
 - (vii) South Skellerup Block, Rolleston
 - (viii) Two Chains Road Block (B1 zone plan change), Rolleston
- (f) Acland Park Subdivision – master planning and landscape design for a 1,000-lot development in Rolleston (2017- current) immediately adjoining the plan change site.
- (g) Plan Change 57 by GW Wilfield Ltd to rezone existing Living 2 and Living 2A land at West Melton to Living (West Melton South) Zone, south of State Highway 73 at West Melton. Urban design advice to the Residential Chapter of the Selwyn District Plan Review (2017).
- (h) Graphic material for the Selwyn Area Maps (2016).
- (i) Stage 3 Proposed District Plan Design Guides – Residential (High, Medium and Lower Density and Business Mixed Use Zones) for Queenstown Lakes District (2018-2020).
- (j) Hutt City Council providing urban design evidence for Plan Change 43. The Plan Change proposed two new zones including a Suburban Mixed-use and Medium Density Residential as well as providing the ability for Comprehensive Residential Developments on lots larger than 2,000m² (2017-2019). The Medium Density Design Guide was a New Zealand Planning Institute Award winner in 2020.

- (k) Jacks Point and Henley Downs – Urban Design Advice for QLDC PDP Stages 1 and 2 (2016-2019).

1.5 I am very familiar with the site and surrounding environment.

2 CODE OF CONDUCT

2.1 Although this is a council hearing, I confirm that I have prepared this evidence in accordance with the Code of Conduct for Expert Witnesses Code of Conduct for Expert Witnesses contained in Part 7 of the Environment Court Practice Note 2023. The issues addressed in this statement of evidence are within my area of expertise except where I state that I am relying on the evidence or advice of another person. The data, information, facts and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. I have not omitted to consider material facts known to me that might alter or detract from the opinions I have expressed.

3 SCOPE OF EVIDENCE

3.1 My evidence addresses the following: -

- (a) The Kevler Development Ltd (**Kevler**) South Rolleston proposal ('the Kevler Proposal').
- (b) Urban Design, Landscape Character and Visual Amenity Issues
- (c) The Urban Design Assessment prepared by Ms Gabi Wolfer as part of the s 42A Report.

3.2 The key documents I have relied upon in preparing my evidence are the following:

- (a) National Policy Statement on Urban Development 2020 (NPS-UD).
- (b) The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (RMA-EHS).
- (c) Canterbury Regional Policy Statement (CRPS).
- (d) The Operative Selwyn District Plan (OSDP).
- (e) Proposed Selwyn District Plan (PSDP), including Variation: Part A.

4 SUMMARY OF EVIDENCE

4.1 In assessing the urban design, landscape character and visual amenity issues relating to the proposed subdivision to create 266 residential lots, I consider the following aspects to be the key issues:

- (a) The development is a mid-sized development with 266 lots proposed with a range of sizes from 300-1927m², with an average lot size of 391m². I do not consider it necessary to provide individual house plans for all lots less than 400m² in size as it is possible to design an appropriate dwelling within the Medium Density Residential Zone framework without creating adverse effects for future residents.
- (b) The current approach to medium density development across the site is appropriate, noting that the sites will likely be developed as standalone, detached residential dwellings. Given the scale of the development I do not consider it necessary to specify that some of the housing needs to be duplex or terrace housing, and that diversity will still be achieved with the current lot layout and density. Having worked on the implementation of Acland Park (HAASHA) with the developer, many of the 'design' aspects included in this development by Council were unworkable or resulted in a poor urban design outcome.
- (c) The 'exemplar' housing plans provided in the application highlight a high-level of amenity for future residents, within the Density Standards provided by legislation. I do not see there being any benefit in providing a 'comprehensive' approach for lots of this size when the standards provide more than an adequate 'envelope' for development.
- (d) Variation and diversity are likely to occur over time as the subdivision is built out, acknowledging that the staging of the development is considered a positive aspect. The development market changes over time, along with material availability and house size requirements and specifications.
- (e) I do not consider that there are any adverse effects resulting from the development in terms of the interface with adjoining residential properties. The boundaries shared with the residential properties on Ledbury Drive, Hungerford Drive, Gemstone Place, Adamite Drive and Shillingford Drive are characterised by 1.8m close board timber fences with no visual or physical connections between existing residential lots and the proposal site. I do not agree with the statement in Ms Wolfer's evidence that 'the degree to which this will affect the outlook and privacy for existing sites depending on the final built form, which at this point is unknown'. It is known – as it is consistent with the Density Standards. Any proposed dwellings on the new lots will be required to meet these Standards, with any possible breaches requiring a separate resource consent application and would be dealt with at a later stage.
- (f) I do not consider density or lot size in itself to be an 'adverse' effect when assessing a residential development, but they do have an effect on urban character – it is just that they are not necessarily a 'good' or 'bad' effect.

In this regard, a sense of spaciousness can be achieved by numerous aspects, including but not limited to the following (Items 1-4 relate to the public realm):

- (i) Street widths
 - (ii) Provision of (public) open space
 - (iii) Building setbacks (front, side and rear yards)
 - (iv) Fencing controls
 - (v) Height limits and recession planes (Height in Relation to Boundaries)
- (g) The proposal includes variation in street widths consistent with the Selwyn District Code of Engineering Standards and includes a main spine road running east to west through the development. The width of this road ranges from 22.0 to 26.0m which is characterised as being on the wider side for a new suburban road. This width will provide for large tree planting, off-road facilities for active transport modes and a high sense of spaciousness. All other roads are 16, 18 or 20m in width which allows for the planting of street (medium and large) trees. When combined with the front yard setbacks and fencing controls, the development will have a spacious feel.
- (h) In terms of open space provision, a 2,215m² reserve is proposed as a neighbourhood park in the centre of the development which is in walking distance (within a 400m radius) of all proposed dwellings. With three road frontages, the open space is in a high-profile (for the development) location and is of sufficient size to allow for the planting of large trees, subject to consultation with Selwyn District's Parks and Reserves Department.
- (i) Compliance with Development Standards of allows for a front yard of 1.5m and side/rear yards of 1m. I consider that these Standards are appropriate and do not necessarily result in a loss of spaciousness or amenity.
- (j) Fencing controls are shown to have a positive impact on the character and feel of a development but are reliant on, initially, the developer, and then local community to control the placement and design of fencing adjacent to the public realm. I do not agree with Ms Wolfer's comment that *'either Landowners are not obtaining consent or that they are unable to comply with the certification conditions, hence consider them as an unproven tool to achieve good outcomes'*. I consider conditions could be ineffective in the context of the no-built commitment proposal and achieving the desired outcomes. I consider controls have worked well on many developments in the Selwyn District (Te Whariki and Acland Park) where the developer has

created more stringent controls than what was required by Council standards.

- 4.2 I consider that the following aspects are **NOT** issues as the proposed development will achieve a well-functioning urban environment, consistent with Policy 1 of the NPS: UD:
- (a) The development is consistent with the Urban Form patterns for Rolleston, as outlined in the Rolleston Structure Plan, the Canterbury Regional Policy Statement and Our Space 2018-2048, and if left as a Rural zone would result in adverse outcomes. The proposed design is consistent with the desire to create a consolidated urban form, being surrounded by residential development.
 - (b) The receiving environment is suburban, with the proposal site combined with the area to the immediate south and southwest being surrounded by residential development on all sides. I consider that the proposed development integrates well with the adjoining urban development, both in terms of density and movement connections.
 - (c) Accessibility and connectivity have been well-considered and incorporated into the design with the provision for active transport modes and a well-connected street network. The development provides new road connections as continuations of Hungerford Drive, Adamite Drive and Lemonwood Drive, and is largely a continuation of the existing movement network.
 - (d) There are no existing features of note on the site, with all existing plantings being exotic shelter belt plantings.

5 RECEIVING ENVIRONMENT AND URBAN FORM

- 5.1 The growth of Rolleston township has been well documented over the past twenty years, from a small settlement of a few houses around the state highway and train station to the current footprint which extends 4km southeast from the State Highway. Since 2000 Canterbury's population has increased from 493,000 people to 645,900 in 2020¹. An increase of 31%. For Rolleston the growth rate has been even greater, with Rolleston's population growing from 9,555 in 2012 to 17,500 in 2017 based on the last census².
- 5.2 The growth of the town slowed in 2009-2010 with the Global Financial Crisis after high growth levels in the early 2000's. At this time the Rolleston Structure Plan was finalised and released (2009) with the intention of identifying areas for residential

¹ <http://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7979>

² <https://www.stuff.co.nz/the-press/news/123429830/plans-for-nearly-1000-new-rolleston-homes-opposed-over-transport-and-land-use-worries>

growth. With the Canterbury earthquakes, the growth of the town commenced again and has continued to grow at a significant rate.

- 5.3 Residential growth typically focused along the southern edge of the state highway and on either side of Rolleston Drive. Lowes Road at the time was the southern edge of higher density (still low density) development, with large lot residential properties located along the road's southern boundary. While a lot of these properties have now been intensified, the lack of connectivity south from Lowes Road is noticeable with most roads being cul-de-sacs and do not continue through to either Goulds Road or Oak Tree Lane. The section of Lowes Road between East Maddisons and Broadlands Drive is 1.115km with no intermediate through road. Broadlands Drive was constructed in 2010 with Clearview Primary School.
- 5.4 Growth of Rolleston to the east was and is limited by the Christchurch Airport's 50 dBA noise contour. To the north, residential growth is prevented by industrial land use and several issues created by the state highway / motorway and the rail corridor.
- 5.5 To the south, the Faringdon development started in 2012³ jumping across Lowes Road and Foster Park, accessed from Goulds Road. Faringdon is continuing to develop the block bordered by Dunns Crossing, Selwyn and Springston-Lincoln Roads, including two blocks consented via the fast-track consent process (PC64). The Borough and Greens (part of Faringdon) are located to the east of Springston-Rolleston Road. Selwyn Road is the southern edge of development with the Gammack Trust block⁴ preventing development further south.
- 5.6 Acland Park was an HAASHA (Housing Accords and Special Housing Areas Act 2013) project approved in 2016 under the name of Chelsea Green. The development was for 888 households and includes a commercial area and associated open space. Acland Park is zoned Rural Inner Plains in the Operative District Plan and General Rural Zone in the Proposed District Plan, but MRZ in Variation 1. The final stages of Acland Park are currently being finalised, including the comprehensive and super lot sites.
- 5.7 According to the Rolleston Structure Plan Development Sequence (2009), the proposal site was not due for implementation until 2027-2041, noting that the south-eastern quadrant is currently under construction and was not 'programmed' until 2041-2075. The Our Space 2018-2018 (2018) Figure 16⁵ also adopted the study area of the Rolleston Structure Plan.

³ <https://www.faringdon.co.nz/developer/faringdon-history>

⁴ The Gammack Trust is a charitable Trust with a perpetual life with the Gammack Trust deed outlining that the land must be held for agricultural purposes and cannot be sold or subdivided for urban development.

⁵ <https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Our-Space-consultation/Draft-Our-Space-2018-2048.pdf>

5.8 In addition to the above, Ms Aston has outlined the identification of the Kevler site within the Urban Growth Overlay in the Proposed District Plan, and its proposed rezoning to Medium Density Residential under the Variation notified in August 2022.

5.9 Overall, given the context described above, I consider that urban development on the site is a natural, in-sequence extension of existing urban areas (Faringdon and Acland Park) and the site can no longer be considered Rural. When combined with the adjoining undeveloped paddocks, the area is only 37.6ha. Rolleston's growth rate is well above the predicted forecasts, with the PC75 area identified in the 2009 Structure Plan coming 'online' well in-advance of the predicted dates in the Structure Plan. The Structure Plan forecasts growth to 20,000 residents in 2044⁶, a milestone which may have already been reached with unofficial estimates of 28,000 people⁷.

6 DENSITY, LOT SIZE AND COMPREHENSIVE DEVELOPMENT, FUTURE BUILDING VARIATION, TYPOLOGY AND BUILT FORM

6.1 All of the above aspects are interlinked into the concerns of Council staff regarding the future design and amenity of the proposed development. Density and lot size are aspects which have an impact on the character of a development but are not necessarily 'good' or 'bad' in terms of effects.

6.2 I have worked on developments where a comprehensive (house plans and landscape plans) designs are required as well as developments which do not require house and landscape plans at the time of subdivision with little difference in the resultant outcome, with the exception of higher density developments where the average resultant lot size is less than 250m². At 350m² it is possible to design a development which achieves a high level of amenity (provision of outdoor living space), incorporates service areas and on-site carparking while meeting required Development Standards without the house design needing to be pre-determined.

6.3 I do consider that a comprehensive approach is appropriate for terrace housing and higher density developments where communal facilities are required, a shared boundary wall is proposed or there are limitations on a site. However, for sites greater than 250m² it is possible for all aspects of a residential development to be incorporated into a site without any adverse effects resulting on neighbouring properties. Site coverage becomes an important control for ensuring that a site is not over-developed and sufficient space is retained for outdoor living spaces. The exemplar house presented for Lot 10 shows a 127.69m² (146.17m² including roof overhangs) on a 300m² lot, resulting in a 48.7% site coverage (50% allowance under the Schedule 3A Standards). The design provides for on-site carparking (garage door setback 6m from the street) as well as a single garage, potential space for bins

⁶ https://www.selwyn.govt.nz/__data/assets/pdf_file/0018/14364/090923-01-Executive-Summary-and-Introduction.pdf

⁷ https://www.citypopulation.de/en/newzealand/southisland/canterbury/2134__rolleston/

and service area in the side yard and an outdoor living space of 48.31m² (20m² with a minimum dimension of 3m). All of the aspects which contribute to residential amenity can be achieved without the need for comprehensive plans to be developed at the subdivision stage.

- 6.4 Building variation and different typologies will occur as the development evolves and the market changes. Having large number of stages in this regard is considered positive aspect as it allows for future flexibility and choice. In 2008 I assessed the urban design aspects of Beach Grove in Kaiapoi, on behalf of Waimakariri District Council, where house plans were developed for every site within the first stage of the development. Each time a design change was made new plans were submitted to council for their records, but the changes typically did not have any discernible effect on urban design outcomes. Having pre-determined designs for each site was of limited benefit, especially when it was apparent that the lot size could address aspects like public/private interface, outlook, privacy and safety.
- 6.5 The resultant built form is likely to be consistent with the surrounding residential developments with predominantly single storey, detached dwellings on individual lots. There is likely to be some consistency in house form and typology given the location and nature of the development. However, this is not considered a negative aspect. Many of our inner-city suburbs were once 'subdivisions' with a consistency of built form or visual coherence, which have since become highly sought after.
- 6.6 A better method for ensuring variation, scale and different typologies is using a permitted 'building envelope' or 'white box' approach when the lots are of a size which allow for all aspects/elements of good urban design to be achieved without providing specific designs.
- 6.7 Overall, in terms of density, lot size and the matters outlined above, I consider it possible for the proposed subdivision and resultant built form to be assessed with a high degree of certainty that it will not result in a poor urban design outcome. All of the design aspects or elements which contribute to a future resident's amenity can be achieved without the need for a comprehensive design to be provided.

7 ACCESSIBILITY AND CONNECTIVITY

- 7.1 Walkability and connectivity are key principles of the development with a hierarchy of street types and connections provided throughout the site, connecting into the adjoining residential developments. The aim of the movement network is to provide a range of modal options for residents, to reduce car-dependency for short local trips while recognising private vehicle use is necessary for longer trips. The grid design encourages connectivity using primary and secondary routes running through the area from west to east, with the primary (spine) road connecting to Kate Sheppard Drive in Acland Park on Springston-Rolleston Road (and the new primary school, Te

Rōhutu Whio). Both primary and secondary routes will provide pedestrian and cycle facilities on both sides of the road, street trees and parking.

- 7.2 The layout of the blocks will have a predominantly north-south orientation where possible to maximise solar gain into rear yards (outdoor living spaces) of all properties. Supporting the road network, off road pedestrian and cycle paths will connect through to existing networks where they exist, being Hungerford, Adamite and Lemonwood Drives.
- 7.3 Overall, the proposal is considered to have a high level of accessibility and connectivity.

8 OPEN SPACE PROVISION AND SPACIOUSNESS

- 8.1 A central open green space of a 2,215m² reserve is proposed as a neighbourhood park in the centre of the development which is in walking distance (within a 400m radius) of all proposed dwellings. With three road frontages, the open space is in a high-profile (for the development) location and is of sufficient size to allow for the planting of large trees, subject to consultation with Selwyn District's Parks and Reserves Department.
- 8.2 The space is provided within a 500m walkable catchment centrally within Harrow Green, as per Selwyn District Council policy. There are a number of other playgrounds or reserves in close proximity, being Lemonwood Grove School (424m), Acland Park (275m) and Foster Park (830m), along with the grounds of Te Rōhutu Whio in Acland Park (510m).
- 8.3 Interlinked with Open space and the sense of spaciousness within the development, the proposal includes variation in street widths consistent with the Selwyn District Code of Engineering Standards and includes a main spine road running east to west through the development. The width of this road ranges from 22.0 to 26.0m which is characterised as being on the wider side for a new suburban road and allows for large tree planting, off-road facilities for active transport modes and a high sense of spaciousness. Even if dwellings were to be built with only a 1.5m front setback, the road corridor will feel spacious and open.
- 8.4 All other roads are 16, 18 or 20m in width which allows for the planting of street (medium and large) trees. When combined with the front yard setbacks and fencing controls, the development will have a spacious feel.

9 RESIDENTIAL INTERFACE AND AMENITY

- 9.1 The proposed development adjoins residential properties to the north and west and is separated from Acland Park by Springston-Rolleston Road. The site adjoins undeveloped paddocks to the south and southwest, but these properties adjoin

residential development further to the west, south and southeast. Future road connections run up to the site boundary and have been incorporated into the subdivision layout. There is an expectation that the proposal site, and site to the south and west, will be developed for residential purposes.

- 9.2 The future residential use of the site is also reinforced by the close board timber fencing installed along the shared boundaries which differs from the boundary interface which was originally proposed by Council for the Acland Park-rural interface. On Acland Park, where it adjoined rural properties, an open style fence with landscape planting was a condition of consent, although it was altered in all instances following consultation with adjoining property owners to a close board timber fence. PC75, 76 and 78 have since been approved which will result in residential development.
- 9.3 I do not consider that there are any adverse effects resulting from the development in terms of the interface with adjoining residential properties. Residential development is anticipated on the site and as long as any future dwellings meet the Development Standards by future dwellings.
- 9.4 Discernible Effects for adjoining residential properties from additional density can be visual dominance or shading. In this instance, neither of these 'effects' are anticipated as the development will adhere to residential development standards. I refer to paragraph 4.3 in Ms Wolfer's evidence for the Variation (1) to the Proposed Plan Change (which describes the proposal site as 'Site 4') which states '*I conclude that the sites, assessed within their context, do not trigger any apparent conflict with surrounding areas and their activities. Vice versa I do not consider that there will be any negative aspects from existing activities in the immediate surrounds on the residential amenity of sites.*' I agree with this statement.

10 RESPONSE TO SECTION 42A REPORT

- 10.1 I have read the Section 42A report and the supporting evidence supplied by Ms Wolfer. There are some aspects of Ms Wolfer's report which I agree with including her Urban Form, Accessibility and Connectivity assessment of the proposal, and opinion that leaving the site as a Rural property would result in a poor outcome, there are many aspects which I do not agree with. The main urban design points of contention are:
- (a) CONTEXT – While it is agreed that the receiving environment is a residential environment, I do not agree that the proposal's density is a departure from existing densities and anticipated densities of adjoining properties. With the implementation of Variation 1 and the Schedule 3A standards, or even with the existing Living Z standards there are sufficient controls in place to ensure adverse effects do not occur for existing residents. There may be a change in character but change in itself is not necessarily negative or positive.

- (b) AMENITY FEATURES – I do not consider that there are any effects on the proposed existing features due to the proposed roading layout. The layout has largely been determined by the residential developments adjoining the site and the desire for the main spine road to link up with Kate Sheppard Drive. There are no existing features of note on the site with existing trees being large shelter belt species which are not suitable for residential subdivisions. The proposed subdivision design is consistent with the adjoining Faringdon development in this regard.
- (c) RESIDENTIAL INTERFACE - The statement in Ms Wolfer's evidence that 'the degree to which this will affect the outlook and privacy for existing sites depending on the final built form, which at this point is unknown'. It is known – the development standards for the Schedule 3A density standards provide this certainty. Any proposed dwellings on the new lots will be required to meet Council development standards (setbacks, site coverage, maximum height and recession planes). Any possible breaches will require a separate resource consent application and would be dealt with at a later stage.
- (d) SPACIOUSNESS – With reference to Policy 3.4.3, I consider that the proposal does achieve the outcomes sought. The proposal does not lack spaciousness as outlined above in previous commentary. Road widths are standard or wider than the norm and the proposed reserve is well positioned. The proposal is also well-connected to existing residential areas, schools and amenities (Faringdon shops and Acland Park shops when they are developed). As shown on exemplar lot plans, it is possible for a large amount of outdoor living space to be provided as well as on-site carparking. The block layout is considered appropriate with a strong north-south orientation which ensure most back yards receive a high level of sunlight while acknowledging that some lots maybe required to have an outdoor living space to the side of the dwelling or in the front yard – indicative landscape plans have been included in the application to show how this is possible while still achieving a positive (high level of interface) relationship between the street and the dwelling. The block length is also appropriate, balancing the need to create walkable neighbourhoods while also ensuring that not too much 'road' is created. Approximately 17 rear lots are created with the design – this equates to only 6% of the design, consistent with '*a subdivision layout that minimises the number of rear lots*'. Diversity of housing types is likely to occur, also noting that the proposal should be viewed in context with the wider Faringdon and Acland Park developments where the housing stock is new and is unlikely to be intensified in the short term. Harrow Green will provide a slightly different option to both developments although similar.

- (e) DENSITY AND LOT DISTRIBUTION – the proposal provides an approach to medium density development which is consistent with the RMA-EHS and the NPS:UD. As outlined above, I consider that it is possible for a high level of amenity to be achieved on each lot without the need to gain additional benefit from an adjacent open space. I consider the approach taken for Harrow Green is a positive, realistic approach to development noting that none of the higher-density lots (adjacent to open space) have been developed in Acland Park while the rest of the development is largely built out.
- (f) SITE LAYOUT – Diversity of housing typologies is not precluded from happening in the future on Harrow Green and is highly likely to occur as the development adapts and changes to market conditions. The proposal creates a series of ‘building envelopes’ or ‘white boxes’ as they are sometimes referred to which allows builders to develop a design with a degree of certainty while also protecting the amenity of existing residents. For lots of the size proposed, I consider this an appropriate method which achieves a positive outcome while still allowing flexibility and creativity.
- (g) TYPOLOGY, VARIATION AND SCALE – All of these aspects are covered by the ‘white box’ approach outlined above while being overly prescriptive at an early stage. Having worked on Acland Park and its medium density developments, I can confirm the issues that were created with the complex, and unnecessary, design controls in the conditions of consent that often lead to a poor design outcome or prevented any creativity. I am confident the proposal will attract different demographic and socio-economic groups but these aspects are not in the control of the developer.
- (h) BUILDING DESIGN – I do not agree that the assessment of amenity is co-dependant on the built form and landscaping provisions within each site or public space. For public spaces, we often work with Councils post-consent to develop a design which they are happy to take over. The subdivision stage is the start of this process rather than the end. For the sites themselves, the exemplar designs highlight that it is possible to achieve a high-level of amenity without being overly prescriptive. The designs meet all design elements, including the placement of garaging, and there is no need to test all 266 lots.
- (i) SMALL LOT V COMPREHENSIVE – I disagree that a comprehensive approach is required for the small lots and a ‘white box’ or permitted ‘building envelope’ is a better method to create diversity and interest.
- (j) NO BUILT DESIGN COMMITMENT – As outlined above, I consider that design variety will occur without the need for a comprehensive design approach, and a ‘white-box’ approach is a preferable method to achieve this.

- (k) FENCING - Fencing controls are shown to have a positive impact on the character and feel of a development but are reliant on, initially, the developer, and then local community to control the placement and design of fencing adjacent to the public realm. I do not agree with Ms Wolfer's comment that *'either Landowners are not obtaining consent or that they are unable to comply with the certification conditions, hence consider them as an unproven tool to achieve good outcomes. I consider conditions could be ineffective in the context of the no-built commitment proposal and achieving the desired outcomes'*. I consider controls have worked well on many developments in the Selwyn District (Te Whariki and Acland Park) where the developer has created more stringent controls than what was required by Council standards.

- 10.2 Overall, I consider that Ms Wolfer is trying to create an overly prescriptive design environment which potentially, albeit unintentionally, leads to a poor urban design outcome.

11 CONCLUSION

- 11.1 In terms of creating well-functioning urban environments, as per Policy 8 of the NPS: UD, the Outline Development Plan addresses each of the Selwyn District Plan's Objectives and Policies in B4: Growth of Townships to ensure a high level of amenity, connectivity and accessibility. It is also consistent with the Outline Development Plan proposed for the MRZ zoning of the Site and surrounding land in the Variation.
- 11.2 In terms of landscape character and values of the area, the proposal will result in a very-low magnitude of change on the existing residential landscape character and values. The existing character of the receiving environment area is already modified with no natural features of note. The partially open character of the site will change to a character which is more compartmentalised into smaller units, but which can be partially mitigated through fencing controls and reserve and streetscape planting to retain a high level of amenity and sense of spaciousness.
- 11.3 In terms of amenity, the adjacent residential properties will not be affected by the proposal. Adjoining suburban residential properties, current and future, overlooking the site currently have limited views into the site with the shared boundary defined by close board timber fencing. Changes to the experience of these residents is considered indiscernible given the character of existing views and existing boundary treatments on their properties.
- 11.4 In this regard the proposal is considered consistent with the National Policy Statement for Urban Development 2020.

Dave Compton-Moen
10 July 2023