

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of a hearing on submissions to Plan  
Change 19 of the Central Otago District  
Plan (Stage 1 – Provisions)

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**STATEMENT OF EVIDENCE OF MR JAKE WOODWARD (PLANNING) ON BEHALF OF  
MR STEPHEN DAVIES (SUBMITTER 19/147)**

11 April 2023

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## **1.0 INTRODUCTION**

- 1.1 My name is Jake Woodward. I am an independent resource management planning consultant and an associate member of the New Zealand Planning Institute. I have over 11 years resource management experience, with the previous seven years working as a consultant in the Central Otago and Southern Lakes Districts. Prior to this, I worked at both Auckland Council and Queenstown Lakes District Council in various resource management planning roles.
- 1.2 I hold the qualifications of a Bachelor of Social Sciences Majoring in Environmental Planning and a Post Graduate Diploma in Environmental Planning, both obtained from the University of Waikato.
- 1.3 Throughout my professional career, I have been involved in a range of resource consenting matters, particularly as it relates to land use consents and subdivisions. I have made numerous appearances in front of various district Councils both as the Council reporting officer and as an independent planning witness.

### **Involvement in this project**

- 1.4 In this matter, I have been engaged by Mr Stephen Davies (Submitter 19/147) to prepare and file evidence in relation to Plan Change 19 of the Central Otago District Plan.

### **Code of Conduct**

- 1.5 Whilst this is not an Environment Court hearing I confirm that I have read and agree to comply with the Environment Court Consolidated Practice Note 2023 for expert witnesses. I confirm that this statement is within my area of expertise except where stated otherwise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express in this statement of evidence.

### **Procedural Matters**

- 1.6 The Submitter was not included in the hearings schedule for Stage 1 as initially distributed. A request to the District Plan administrator was made on 4 April 2023 to

include the Submitter in the Stage 1 hearing programme. Mr Davies request was approved and is due to be heard on 11 May 2023.

### **Scope of evidence**

- 1.7 This evidence will focus the crux of the Submitter's original submission, including the intent of that submission and how it applies to the Stage 1 hearings.
- 1.8 The Submitter's original submission was essentially phrased in two parts;
  - a. Rationalising the current Residential Resource Area (4) boundary to encompass the degree of residential development consented under EC Decision 2017 NZEnv193; and
  - b. To extend the Residential Resource Area (4) boundary to encompass an additional 2.5 hectares of land which currently sits within the Rural Resource Area.
- 1.9 An analysis and discussion around the appropriateness of extending the Zone boundary will be considered as part of the Stage 2 round of hearings, scheduled for May 2023.
- 1.10 While not overly explicit, the Submitter's original submission (19/147) was intended to support the retention of the Residential Resource Area (4) as it relates to his land and for that Zoning (Residential Resource Area (4)) to extend over additional areas of his site. In drafting the submission, the Submitter's intent was to seek the retention of the densities pertaining to the Residential Resource Area (4) being a minimum of 1,500m<sup>2</sup> and an average of 2,000m<sup>2</sup>. Notwithstanding, the Submitter further submitted in support on submission 19/135 to consider a reduced allotment area for residential development in the Large Lot Residential Zone.
- 1.11 The intent of Plan Change 19 was to align the current zoning framework to that recommended by the National Planning Standards through standardising the zonings accordingly<sup>1</sup>. For Bannockburn, Council signalled the intent to convert the current Residential Resource Area (4) Zone to that of the Large Lot Residential Zone. The

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<sup>1</sup> Paragraph 13, Plan Change 19 s32 Report.

corresponding minimum density proposed for the Large Lot Residential Zone is 2,000m<sup>2</sup> as per the notified provisions.

- 1.12 In advising the Submitter on the intent of Plan Change 19, the Submitter generally supports the intent to reclassify the Residential Resource Area (4) as Large Lot Residential, however opposes the increase in the minimum allotment size from what is currently 1,500m<sup>2</sup> (with an average of 2,000m<sup>2</sup>) to a minimum of 2,000m<sup>2</sup> only. This has prompted the Submitter to support the relief sought by Submitter 19/135 as it relates to the minimum density only.
- 1.13 The Council's s42A report (prepared by Consultant Planner, Ms Liz White) suggests a retention of the proposed 2,000m<sup>2</sup> minimum on the basis that Ms White does not, "consider it appropriate to amend the densities such that the number of variations increase further, particularly where the change sought does not relate to maintaining existing amenity and character."<sup>2</sup> A cursory overview of the Bannockburn township details an extensive variation in allotment sizes that sit below the suggested 2,000m<sup>2</sup> minimum. To suggest that the existing amenity and character of Bannockburn is defined by 2,000m<sup>2</sup> allotments is not considered fully substantiated without further analysing the overall densities that characterises the Bannockburn Township. By way of a crude analysis, within a 500-metre radius of the Submitter's property, approximately 40%<sup>3</sup> of all individual land parcels are below 2,000m<sup>2</sup> in area. While it is acknowledged that Ms White recognises that minimum Lot sizes proposed in PC19 are higher than the current minimum lot sizes applying, it is not considered justified to infer that the average establishes the overall character of Bannockburn when recognising a high proportion of allotments are below 2,000m<sup>2</sup> (refer to **Appendix [A]** and the following figure).

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<sup>2</sup> Paragraph 169, Section 42A Report, Report on Submissions and Further Submissions Part 1 (Provisions).

<sup>3</sup> Approximately 40 allotments out of a total of 101 identified land parcels within 500 metres of the site.

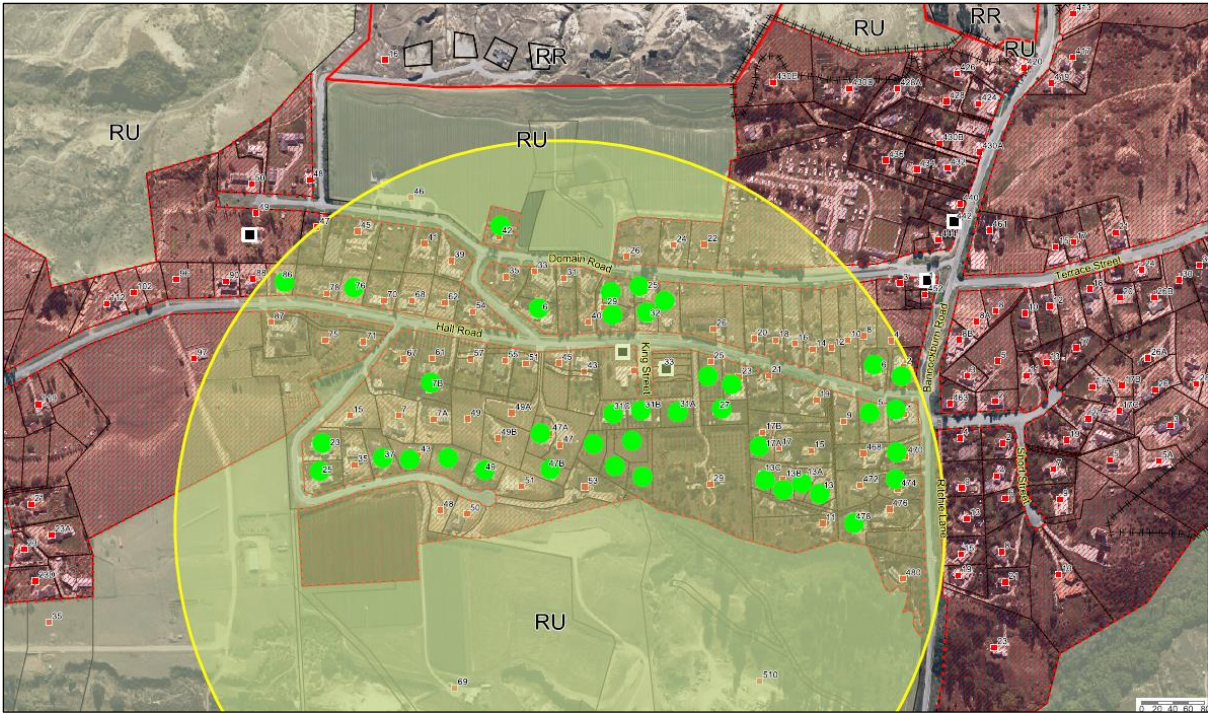


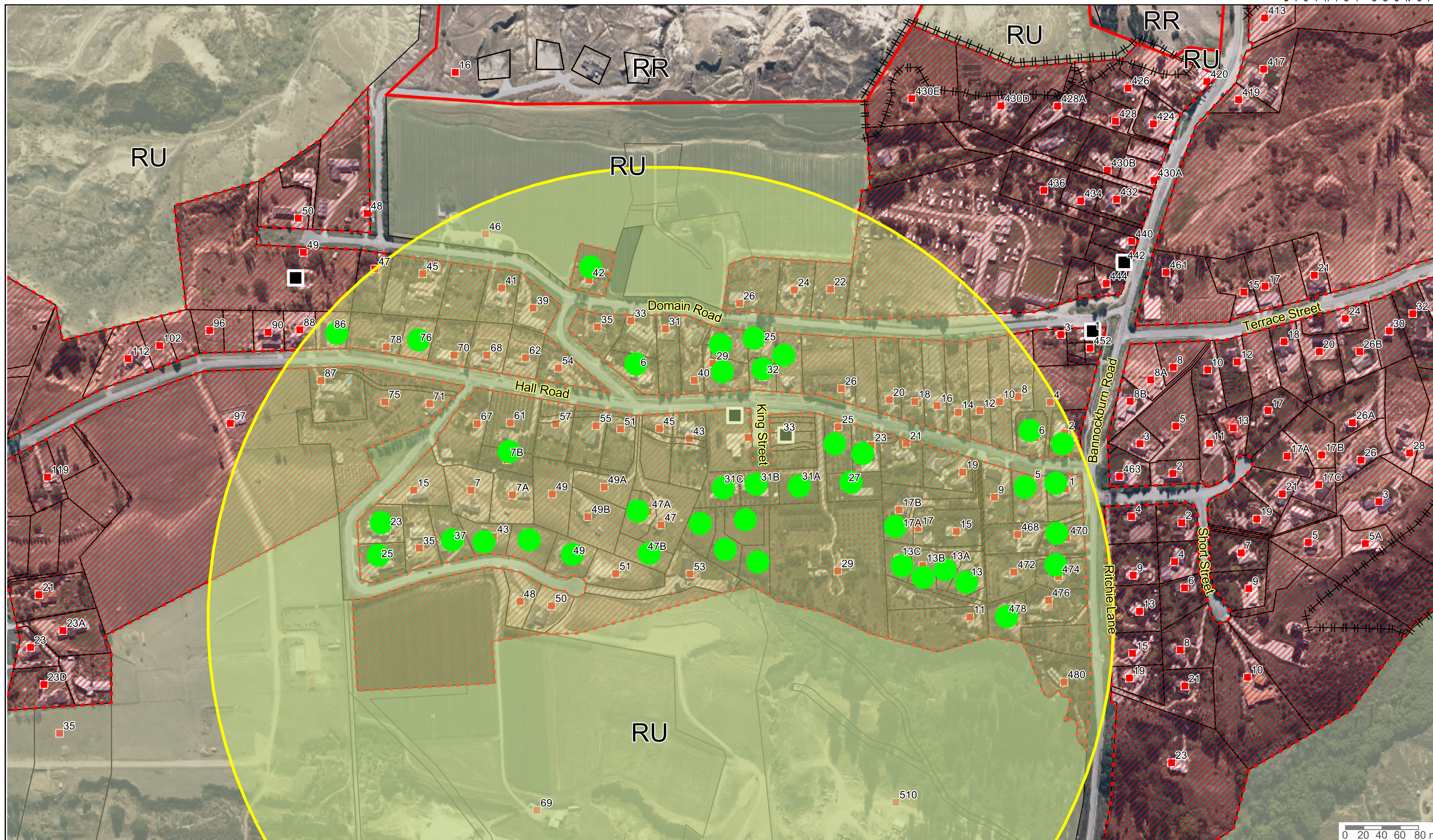
Figure 1: Extract of CODC GIS highlighting allotments with an allotment area less than 2,000m<sup>2</sup> within 500 metres of Submitter's property.

1.14 While submitter 19/135 seeks a reduced density of 1,200m<sup>2</sup> minimum with an average of 1,500m<sup>2</sup>, I consider that to go below 1,500m<sup>2</sup> would represent a fundamental shift in character over and above what presently characterises the immediate vicinity of the Submitter's property. Accordingly, I recommend that the minimum of 1,500m<sup>2</sup> be retained and suggest that the following change is made:

LLRZ-S1	Density	Activity Status where compliance not achieved:
<b>Large Lot Residential Zone (Excluding Precincts 1, 2 &amp; 3)</b>	1. The minimum site area per residential unit is <del>2000m<sup>2</sup></del> <u>1,500m<sup>2</sup></u> .	NC

# Allotments less than 2000m2

Created Date: 11/04/2023  
Created Time: 3:21 PM  
Created By: anonymous



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Projection: NZTM2000  
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