

**BEFORE THE PANEL ON BEHALF OF
CENTRAL OTAGO DISTRICT COUNCIL**

Plan Change 19 – Stage 1

UNDER

the Resource Management Act 1991

IN THE MATTER

Plan Change 19 – Stage 1

STATEMENT OF EVIDENCE OF BRODIE TYLER COSTELLO,

ON BEHALF OF LANDPRO LTD

5 April 2023

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QUALIFICATIONS AND EXPERTISE

1. My full name is Brodie Tyler Costello. I am a Planner at Landpro Limited, a planning and surveying consultancy. I have been employed by Landpro Limited since October 2019.
2. I hold the qualifications of a Bachelor of Arts (Hons) in Political Science and a Masters in International Law and Politics from the University of Canterbury, and a Post-graduate Certificate in Planning from Massey University. I have five years' experience in resource management.
3. During this period, I have been involved in a range of resource consent matters from a regulatory perspective, including providing policy advice, stakeholder engagement, and reviewing, evaluating, and drafting resource consent applications.
4. In this matter, I am representing Landpro Ltd in their engagement on Plan Change 19, including the preparation of the submission and preparation of this evidence.

CODE OF CONDUCT FOR EXPERT WITNESSES

5. I have read the Code of Conduct for Expert Witnesses within the Environment Court Consolidated Practice Note 2014 and I agree to comply with that Code. This evidence is within my area of expertise, except where I state I am relying on what I have been told by another person. To the best of my knowledge I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.

SCOPE OF EVIDENCE

6. I have limited this submission to the matters raised in our submission.

COMMENT ON PLANNING REPORT

7. I have read the recommending report prepared by Ms White. Generally, CHP Development is in agreement with the proposed recommendations. Where CHP Development Ltd is not in agreement, this has been expanded on below.
8. CHP Developments Ltd does not support Ms White's recommendation to retain MRZ-S4 as is, requiring a building coverage area of no more than 40%. This building coverage limits the permitted activity threshold for smaller lots, as well as discourages higher density infill development. While there is a desire for the standard to provide for an open and spacious feel within the Central Otago context, there is a need to encourage development given the shortage of housing available in the district. New plans in other districts provide for higher building coverage standard in the medium density zone, for example, both the Proposed Queenstown District Plan and Proposed Porirua District Plan provide for a building coverage of 45% in the medium density zone. A 45% building coverage standard would support development in the Central Otago district, while providing for the open space values of the district.
9. CHP Developments Ltd supports the recommendation to amend MRZ-S7, to reduce the required balcony size from 12m² to 8m².
10. CHP Developments Ltd does not support Ms White's recommendation to retain MRZ-S8 as is, requiring "at least 30% of the site shall be planted in grass, trees, shrubs or other vegetation".
11. Ms White considers that this is sufficient to achieve the outcomes in most or all circumstances, however this coverage requirement is too high for the permitted activity threshold, with any lesser coverage requiring a consent. As noted in the original submission, there are situations where less than 30% landscaped area is preferable, and where the coverage requirement cannot be easily achieved in most or all circumstances. For example, subdivisions of existing properties where rear lots require a driveway access, would leave limited space available to provide for a dwelling as well as meeting the permitted threshold for landscaping.

12. The landscaping threshold should be revised to exclude the land required to access a property. For example, the Proposed Porirua District Plan specifically provides for landscaped area coverage which excludes driveways or other means of access.
13. Ms White further notes that: "Standards in other plans I reviewed were between 20-35% so I do not consider the proposed threshold to be out of step with other plans." Ms White specifically references the Proposed New Plymouth District Plan, Proposed Queenstown District Plan and Christchurch District Plan. The required landscape areas in medium density zones in these referenced plans are as follows:
 - Proposed New Plymouth District Plan – 25%
 - Proposed Queenstown District Plan – 25%
 - Christchurch District Plan – 20%
14. It is also notable that the required landscape areas in other plans not referenced in relation to this standard but referenced elsewhere in the report, being the Proposed Selwyn District Plan and the Proposed Waimakariri District Plan, have a landscaped coverage requirement in medium density zones of 20%.
15. Ms White has somewhat understated the difference between other newly proposed plans in other districts against that which is proposed here. A 25% landscaped coverage area, rather than 30% landscaped coverage area, would better align with other modern district plans while still providing for the open and spacious feel of the Central Otago District.
16. CHP Developments Ltd supports the recommendation to delete MRZ-S10.2, removing the requirement for a 3m x 3m outlook space from the principal bedroom.
17. CHP Developments Ltd supports the recommendation to amend MRZ-S10, to remove the requirement for residential units to have a habitable room located at ground level, for those located above the ground floor level.

SUMMARY

18. Overall, CHP Developments Ltd is generally supportive of the recommendations by Ms White as identified above, however do consider that some further changes are required.

Brodie Costello

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Planner – Landpro Limited

5 April 2023

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