

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

**UNDER THE**                    THE RESOURCE MANAGEMENT ACT 1991 (ACT)

**IN THE MATTER**            OF PLAN CHANGE 19 RESIDENTIAL SITE SPECIFIC ZONING  
RELIEF

**BETWEEN**                    **TOPP PROPERTY INVESTMENTS 2015 LTD**

**AND**                            **CENTRAL OTAGO DISTRICT COUNCIL**

**STATEMENT OF EVIDENCE OF JOANNE SKUSE FOR TOPP PROPERTY  
INVESTMENTS 2015 LTD**

**INTRODUCTION**

1. My full name is Joanne Skuse.
2. I hold the qualification of Bachelors of Law (LLB) from the University of Exeter, United Kingdom. I have 5.5 years' experience in planning and resource management, and I also hold New Zealand Planning Associate membership.
3. I am a Senior Planner at The Property Group, and I have worked at The Property Group since 10 May 2021.
4. My recent project work has included advising on multiple master planned subdivision proposals, including undertaking environmental effects assessments for both rural and urban subdivisions, preparing consent applications, consultation with affected and interested parties and appearing at Council hearings. In addition, I have also been involved in a number of large scale projects that have dealt with the amenity effects, and reverse sensitivity effects of change in land use in rural areas.

5. I have been involved in the Gore District Council Proposed Plan review as a Consultant drafting district wide and location specific chapters. I have also lead the preparation of a residential development area, upzoning rural land appropriately for urban development.
6. Directly prior to joining The Property Group I was employed at the Queenstown Lakes District Council (Council or QLDC) from February 2017 to April 2021, where I held role of Planner.
7. As part of my roles at QLDC I processed numerous consent applications in the QLDC urban areas and for sites within the rural Outstanding Natural Landscape and Rural Character Landscape areas.

### Code of Conduct

8. I have read the Environment Court's Code of Conduct for Expert Witnesses in the Environment Court of New Zealand Practice Note 2023, and I agree to comply with it. My qualifications and experience as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

### SCOPE OF EVIDENCE

#### Site description

9. The scope of this submission is the same as that that was lodged in the submitter's initial submission on the Proposed Plan Change. Specifically, the proposed re-zoning of land south of Mutton Town Road and proposed future growth development area, comprising Lot 1 DP 428116, Lot 2 DP 428116, Lot 2 DP 300714) at 74-34 Mutton Town Road, Clyde (8.96ha).

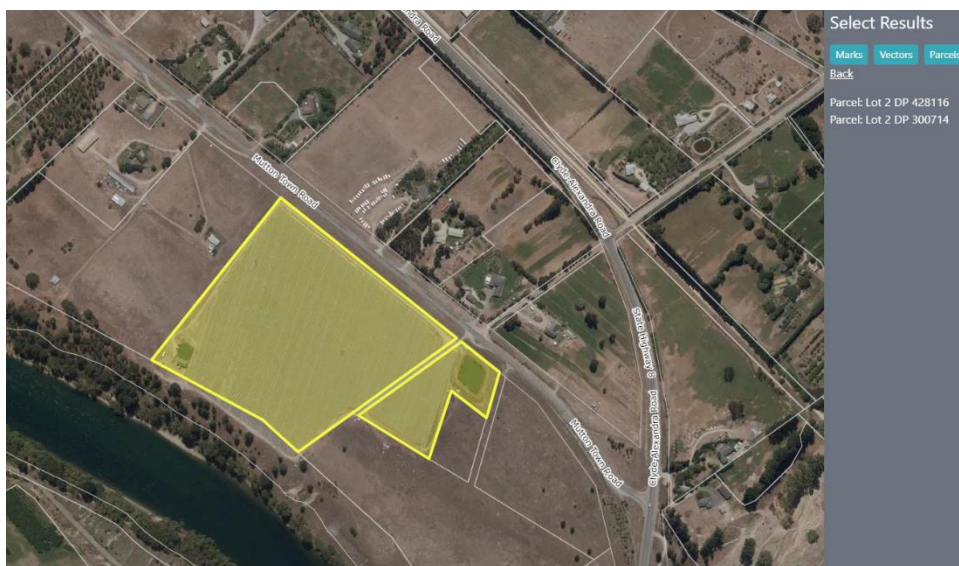


Figure 1: Subject Site Lot 2 DP300714, Lots 1-2 DP 428116

10. The intention of this submission is to zone the underlying land Low Density Residential, and to recognise that there are structure planning matters (mainly relating to the availability of infrastructure) that need to be addressed

in order for development to be able to progress under either a land use consent or a subdivision consent.

11. The intention is that an objective be added to the Low Density Residential Zone that refers to the Muttontown Structure Plan and gives direction to the submitter's intention of developing the site in a comprehensive manner.
12. It is also the intention that the policy relating to Future Growth Overlay be updated to include a policy relating to the Muttontown Structure Plan area.
13. In terms of the rules under the Low Density Residential zone, it is the intention that any residential development that is not in accordance with the structure plan is non-complying. Under the subdivision rules any subdivision not in accordance with the structure plan will be non-complying.
14. Should Council accept the rezoning of the site to Low Density Residential the structure plan would then apply to any development within the structure plan area. The structure plan is proposed to be contained within the Appendices of the PDP. That means that when applying for a resource consent a plan user would check the zone, and note that the site is zoned residential but located within a future urban zone, with a structure plan that applies to the site along with design criteria and standards. The development would then need to be undertaken in accordance with the structure plan Objectives, Policies, Rules and Standards.
15. The structure plan contains roading connections to neighbouring sites to support future development and will anchor the urban area.
16. In support of this, urban design evidence is provided by Urban Designer Bruce Weir of Urban Designer Saddleback Planning Limited in Attachment 1.

## Proposed Amendments to Low Density Chapter

### Low Density Residential Zone

The Low Density Residential Zone covers the majority of the residential areas in the townships of Alexandra, Clyde and Cromwell, a central area within Pisa Moorings, 56 as well as all of the residential areas in the townships of Roxburgh, Ettrick, Millers Flat, Omakau, Ophir, St Bathans, Naseby, Ranfurly and Patearoa. This zone provides for traditional suburban housing, comprised predominately predominantly of detached houses on sections with ample on-site open space, and generous setbacks from the road and neighbouring boundaries. Buildings are expected to maintain these existing low density characteristics, minimise the effects of development on adjoining sites and integrate with the surrounding area. While the focus of the zone is residential, some commercial and community facilities are anticipated, where they support the local residential population and are compatible with the character and amenity values of the zone.

The Future Growth Overlay identifies any area that has been signalled in the Vincent Spatial Plan for low density residential zoning, in future. The provisions applying to this area are those of the underlying zoning, and therefore a Plan Change will be required to rezone this area in future. However, the Overlay is intended to identify any location where future growth is anticipated, when further supply of residential land is required, and provided that there is capacity within the reticulated water and wastewater networks to service the additional development.

### **Muttontown Structure Plan (Lot 2 DP 300714, and Lot 2 DP 305961)**

This Structure Plan relates to the Muttontown new urban area zoned as Low Density Residential and identified in the Vincent Spatial plan as such. Overall, the Muttontown new urban area is considered an ideal area for greenfield residential development between Clyde and Alexandra. Due to these and other reasons the land is identified in the Vincent Spatial Plan for future urban growth. It is also an area that enables the Council to meet its housing supply requirements.

### **POLICY AND OBJECTIVES, AND RULES – Low Density Residential Zone**

<b><u>LRZ-02</u></b>	<b>Character and amenity values of the Low Density Residential Zone</b>
	<p>The Low Density Residential Zone is a pleasant, low-density suburban living environment, which:</p> <ol style="list-style-type: none"> <li>1. contains predominantly low-rise and detached residential units;</li> <li>2. maintains a good level of openness around buildings;</li> <li>3. provides good quality on-site amenity and maintains the anticipated amenity values of adjacent sites; and</li> <li>4. is well-designed and well-connected into surrounding area.</li> <li>5. <u>provides for comprehensively designed, residential development at higher densities, within the Muttontown Structure Plan area.</u></li> </ol>

<b>LRZ-P6</b>	<b>Future Growth Overlay</b>	
Recognise and provide for rezoning of land <u>OR resource consent applications</u> within the Future Growth Overlay, where:		
<ol style="list-style-type: none"> <li>1. It is demonstrated as necessary to meet anticipated demand; and</li> <li>2. It is able to be serviced by reticulated water and wastewater networks.</li> <li>3. <u>Development is enabled via the Muttontown Structure Plan</u></li> </ol>		
<b>LRZ-RXX</b>	<b>Development (Muttontown Structure Plan (MSP) area)</b>	
<b><u>Low Density Residential Zone</u></b>	<u>Development not in accordance with an MSP on land located within the Muttontown new urban area.</u>	<b><u>NC</u></b>

<b>SUB-R4</b>	Subdivision not otherwise specified	
All Residential Zones	<p><b>Activity Status: RDIS</b></p> <p><b>Where the activity complies with the following rule requirements:</b></p> <p>SUB-S1</p> <p><b>Matters of discretion are restricted to:</b></p> <ol style="list-style-type: none"> <li>1. Whether the subdivision creates allotments that can accommodate anticipated land uses and are consistent with the purpose, character, and qualities of the applicable zone.</li> <li>2. The provision of adequate network utility services (given the intended use of the subdivision) including the location, design and construction of these services.</li> <li>3. The ability to lawfully dispose of wastewater and stormwater.</li> <li>4. The location, design and construction of access to public roads and its adequacy</li> </ol>	<p><b>Activity status when compliance with rule requirement(s) is not achieved:</b></p> <p>Refer to Rule Requirement Table.</p>

	<p>for the intended use of the subdivision.</p> <p>5. The provision of landscaping, including road berms.</p> <p>6. Earthworks necessary to prepare the site for development occupation, and/or use.</p> <p>7. Subdivisional design including the shape and arrangement of allotments to:</p> <ul style="list-style-type: none"> <li>i) facilitate convenient, safe, efficient and easy access.</li> <li>ii) achieve energy efficiency, including access to passive solar energy sources.</li> <li>iii) facilitate the safe and efficient operation and the economic provision of roading and network utility services to secure an appropriate and co-ordinated ultimate pattern of development.</li> <li>iv) maintain and enhance amenity values.</li> <li>v) facilitate adequate access to back land.</li> <li>vi) protect existing water races.</li> </ul> <p>8. The provision of or contribution to the open space and recreational needs of the community.</p> <p>9. The provision of buffer zones adjacent to roads, network utilities or natural features.</p> <p>10. The protection of important landscape features, including significant rock outcrops and escarpments.</p>	
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	<p>11. Provision for pedestrian and cyclist movement, including the provision of, or connection to, walkways and cycleways.</p> <p>12. The provision of esplanade strips or reserves and/or access strips.</p> <p>13. Any financial contributions necessary for the purposes set out in Section 15 of this Plan</p> <p>14. <u>The requirements of the Muttontown Structure Plan Area</u></p>	
<b>SUB-S1</b>	Minimum Allotment Size	Activity Status where compliance is not achieved:
<b><u>Low Density Residential Zone (MSP)</u></b>	<u>The minimum Lot size shall be no less than 300m<sup>2</sup>, and in accordance with the Muttontown Structure Plan.</u>	<b><u>NC</u></b>

## **ADDITIONAL STRUCTURE PLAN APPENDIX**

The following is proposed to enable the Muttontown Structure Plan to enable development, subject to demand and servicing.

### **CODC PDP Appendix XX**

#### **Muttontown Structure Plan (Lot 2 DP 300714, and Lot 2 DP 305961)**

##### ***Introduction***

This Structure Plan relates to the Muttontown new urban area zoned as Low Density Residential and identified in the Vincent Spatial plan as such. Overall, the Muttontown new urban area is considered an ideal area for greenfield residential development between Clyde and Alexandra. Due to these and other reasons the land is identified in the Vincent Spatial Plan for future urban growth. It is also an area that enables the Council to meet its housing supply requirements.

##### ***The Purpose of the Muttontown Structure Plan***

The structure plan seeks to guide and where appropriate direct subdivision and land development within the Muttontown Urban Growth Area. The Structure plan provides a framework for the landowner and/or developers to prepare subdivision and development proposals to ensure an integrated development approach while promoting the efficient use of infrastructure resources and avoiding, remedying or mitigating the potential adverse effects of urban development on the surrounding environment.

The Structure Plan sets out Design Outcomes which apply to the assessment of applications for subdivision and development activities, so as to achieve its purpose and objectives. Applications for Subdivision or Land Use Consent (in the case of comprehensive residential developments) are to show how these Design Outcomes will be achieved. Conditions may be imposed on consents granted to give effect to these design outcomes.

The rationale behind this approach is to ensure the effects of urban development within the Muttontown Urban Growth Area are appropriately managed and to provide neighbouring landowners with certainty and reassurance regarding how these effects will be managed.

##### **Objectives of the Muttontown Structure Plan**

- That in providing for residential housing needs the Muttontown Urban Growth Area develops into a place that adds value to Clyde and Alexandra by providing an opportunity to create innovative land development responses to this unique environment;
- That the quality of the environment created within the Muttontown Urban Growth Area reflects best practice urban design outcomes;
- That the development provisions that will shape the Muttontown Urban Growth Area seek to achieve the objectives of the Regional Policy Statement



and the Vincent Spatial Plan in terms of development that uses land efficiently while creating a high quality residential environment.

## **Requirements**

### **Infrastructure Services**

#### ***Stormwater***

Stormwater is to be managed and treated by means of a low impact stormwater systems. The exact location and size of the ponds/wetlands to be constructed within the Muttontown Urban Growth Area will be confirmed during subdivision.

#### ***Water***

The watermain in Sunderland Street will need to be extended, which will be subject to the programmed work in the Council's Long Term Plan. Internal service mains can then be positioned within the development area to suit road layouts and provide alternative connectivity and continuity for firefighting.

Water Supply upgrading is to occur in tandem with staged development and be either constructed by the developer(s) or funded through financial contributions.

Any easements or other arrangements to provide for conveyance of water supply services are to be demonstrated at the time of any application for subdivision.

#### ***Wastewater***

The existing wastewater services network will need to be extended and upgraded along Mutton Town Road, which will need to be programmed work in Council's Long Term Plan.

A new pump station may also be required to be constructed and located within the reserve near the Mutton Town Road frontage and as shown indicatively on the Structure Plan map.

The internal wastewater network for the development shall be constructed by the developer in accordance with the CODC engineering and subdivision standards.

#### ***Other Infrastructure Services***

New residential development is to be serviced for power, gas and telecommunications utilities by each of the respective network utility providers.

#### **Roading**

Roading to be provided as indicated within the structure plan, being the general location of main roads, pedestrian access, and edge lanes. Roading and pedestrian pathways shall enable future connections to neighbouring sites.

### **Green Space Network**

The Open Space within the structure plan area comprises a reserve area that will provide opportunity for passive recreation and may accommodate community based activities, that would be subject to the appropriate resource consents.

The reserve areas are configured to provide linkages, to create an open feel to the residential area and to assist in the establishment of the different neighbourhood characters of the area. These areas will primarily provide for passive recreation activities but also have a significant role to play in providing for the overall stormwater conveyance and treatment system for the area.

***Design Outcome:*** *An open space network with recreational linkages that join the reserve areas within the structure plan area and connect both existing and new neighbourhoods to each other and to the open space areas.*

### **Design Criteria**

- The reserve areas shall be located and configured as depicted in the Muttontown Structure Plan map;
- That public recreational linkages from the Clutha River through to the Muttontown reserve areas shall be provided as shown on the Structure Plan map;
- That provision shall be made for maintenance access to each of the reserve areas;
- That the reserve areas and recreational linkages are to be vested in the Central Otago District Council upon subdivision.

### **Neighbourhood Centre**

***Design Outcome:*** *A neighbourhood centre that can reduce car dependency and give access to local services and/or commercial activities that does not detract from the retail centres of Clyde and Alexandra.*

### **Subdivision Allotment Design and Residential Density**

***Design Outcome:*** *The creation of a suburban residential area that is suitable for a diverse community at a variety of life stages.*

### **Design Criteria**

- Over the neighbourhood as a whole there should be a sufficient range of site sizes that encourage diversity in the types of houses to be built;
- The design and placement of sections within any subdivision shall enable a mix of house types within any one street;
- A minimum lot size of 300m<sup>2</sup>;
- A maximum total residential density of 25 residential buildings per hectare (gross area) over the Muttontown Structure Plan area;

- District Plan standards will ensure that section sizes are sufficient to be able to meet the performance standards for the neighbourhood and a variety of section sizes to provide good urban design outcomes;
- District Plan standards will also ensure that subdivision designs are in accordance with urban design principles.

Standards specific to the Muttontown Urban Growth Area.

<b><u>LRZ-RXX</u></b>	<b><u>Development (Muttontown Structure Plan (MSP) area)</u></b>	
<b><u>Low Density Residential Zone</u></b>	<u>Development in accordance with an MSP on land located within the Muttontown new urban area.</u>	<b><u>PER</u></b>
<b>Standards</b>		
<b><u>LRZ-MSP1</u></b>	<b><u>Density</u></b>	
<b><u>Low Density Residential Zone (MSP)</u></b>	<u>1 dwelling per 500m<sup>2</sup> over the gross site area.</u>	<b><u>NC</u></b>
<b><u>LRZ-MSP2</u></b>	<b><u>Open Space</u></b>	
<b><u>Low Density Residential Zone (MSP)</u></b>	<u>If a Comprehensive Residential Development Plan is being prepared then a minimum open space requirement of 40% is to be achieved (This includes lanes).</u>	<b><u>NC</u></b>
<b><u>LRZ-MSP3</u></b>	<b><u>Building Height</u></b>	
<b><u>Low Density Residential Zone (MSP)</u></b>	<u>Building Height maximum of 8 metres.</u>	<b><u>NC</u></b>
<b><u>LRZ-MSP4</u></b>	<b><u>Building coverage</u></b>	
<b><u>Low Density Residential Zone (MSP)</u></b>	<u>A maximum building coverage of 40%</u>	<b><u>NC</u></b>
<b><u>LRZ-MSP5</u></b>	<b><u>Landscapes permeable surface coverage</u></b>	
<b><u>Low Density Residential Zone</u></b>	<u>The minimum permeable surface is 30% of the gross site area.</u>	<b><u>NC</u></b>

<b><u>Zone</u></b> <b><u>(MSP)</u></b>		
<b><u>Subdivision</u></b>		
<b><u>SUB-RX</u></b>	<u>Subdivision of land located within the Muttontown new urban area where no structure plan has been approved</u>	<b><u>NC</u></b>