



Memorandum

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Attention: Ann Rodgers | Principal Policy Planner, Central Otago District Council

Cc: Liz White, Consultant Planner

Reference: Lunday Expert Evidence Peer Review Memo

From: Tim Church, Partner | Urban Designer, Boffa Miskell

Date: 18th August 2023

Project No: BM191063G

Introduction

- Central Otago District Council is progressing through Plan Change 19 – Residential Zoning (PC19) to the Operative Central Otago District Plan. PC19 involves rezoning new land for residential use, identifying some areas for future growth, aligning existing residential zoning with the proposed new zones, and includes new provisions for managing land use and subdivisions within the residential zones. The Large Lot Residential Zone (LLRZ) has the lowest density of the urban residential zones proposed within PC19, with a greater ratio of open space than built form.
- Following the conclusion of hearing of submissions on PC19 on Friday, 26th May 2023, this memo responds to the request for ‘Expert Evidence Reviews’ within Directions of the Central Otago District Council Hearings Panel - Minute 4, as follows:

‘Mr James Lundy (Urban Design) on behalf of, Rowan and John Klevstul (#163).’

- Ms White, the Council’s Consultant Planner, in her s42A Report (Part 2) outlines the extent of their submission and the location of the Subject Site that Mr Lunday refers to in his evidence:

‘J Klevstul and R Klevstul and Rubicon Hall Road Limited (#163) seek that approximately 22.2ha of land to the south of Bannockburn be rezoned from Rural Resource Area to LLRZ, with a precinct applied to allow for an average allotment size of 1000m², or lower where the urban design principles outlined in a “Rural Hamlet Vision” (attached to the submission) are given effect to, and for a development area plan/structure plan to be included in the District Plan. They also note that “purpose statement text, objectives and other methods, such as policies, rules and assessment matters” may be required to facilitate the zoning and align subdivision with the development area plan, but do not identify the specific changes sought to the PC19 provisions.’ (s42A, para 100)

- Boffa Miskell have been engaged by Central Otago District Council (CODC / Council) to peer review Mr Lunday’s evidence from an Urban Design perspective. Boffa Miskell provided urban design advice during the early preparation of the Medium Density Residential Zone provisions and prepared the associated design guide, including guidance on Comprehensive Residential Development. While Boffa Miskell did not provide Urban Design advice in relation to PC19 Large Lot Residential Zone provisions or zoned areas, Boffa Miskell has considered this residential typology as part of assisting Council in the preparation of the Vincent Spatial Plan.

Methodology

- A review has been undertaken of the relevant PC19 LLRZ provisions proposed, Council’s Section 42A Report Part 2 (Zoning Requests) by Ms White and evidence submitted and presented on behalf of Rowan and John Klevstul (#163) to the Council Hearing, including:

- a) Urban Design Evidence of Mr James Lunday (16th May 2023)
 - b) Planning Evidence of Mr Brett Giddens (16th May 2023)
6. The scope of this peer review does not include justifying or otherwise the proposed LLRZ provisions, only the location qualities and specific precinct amendments of the zoning request submission from an urban design perspective.
 7. This peer review has largely been based on a desktop review with no site specific investigations undertaken due to time constraints. Although, having visited the area previously, there is a general familiarity with the Bannockburn context, including the Old School Road area.

Discussion

8. This peer review is structured on several premises addressed in Mr Lunday's evidence. Firstly, the appropriateness of additional growth for the Bannockburn settlement and, *if* growth, then the acceptability of managing it through expansion of the settlement, rather than infill. Secondly, *if* expansion, then the appropriateness of its location and edge definition. Thirdly, the appropriateness if the expansion is a 'hamlet' / clustered development, rather than a contiguous extension with existing zones. Fourthly, the appropriateness of the proposed structure plan / masterplan outcomes and amended provisions, including the alignment with PC19 Objectives and Policies.

Managing any growth through infill or expansion

9. This first section discusses the appropriateness of additional growth for the Bannockburn township and, if the Hearings Panel considers growth is acceptable, then the acceptability of managing it through expansion of the settlement, rather than infill.
10. Foremost, the overall growth projections and yield assessment has been addressed by Ms White, indicating that the Cromwell township, rather than the Bannockburn settlement, is proposed to accommodate most of the growth across the Cromwell Ward:

'As noted in the yield assessment, there is a large surplus in Cromwell township, which is "expected to cover most of the deficit seen in Bannockburn, with large housing supply driving a shift to greater growth rates within Cromwell township." ' (s42A, para 108)

11. Mr Lunday (para 28) suggests that *if* there was a yield deficit in Bannockburn then the rezoning of Rural land to LLRZ in the south of Bannockburn would be a potential way to offset this, 'in-part'. However, given the predominance of existing and proposed LLRZ land in Bannockburn, the Cromwell Spatial Plan 'Principle 3: Foster Increased diversity in housing choices' and 'Principle 6: Create a compact walking, cycling and accessible town' would be more appropriately addressed from an urban form perspective by the second part he suggests, being:

'...greater intensification proposed within the existing centre (along "the Main Street" of Bannockburn Road) to create a critical mass to stimulate local facilities (as suggested in the Cromwell Spatial Framework Stage 1 Spatial Plan May 2019).' (Lunday, para 28)

12. The focus on growth within Cromwell and an emphasis on a residential infill approach is further reinforced in the Cromwell Spatial Plan's section on 'Settlements within the Basin', which includes Bannockburn, identifying:

'Key features of the Spatial Framework response for the Settlements, including:

- *Adopting the growth plan for Cromwell 2050 with "growth focused within existing Cromwell", which retains the existing pattern of development and 'countryside' living amenity and landscape values of the settlements,*
- *Supporting gradual infill housing within the extent of current zones, generally at lower densities to consolidate residential development and retain the local character of the settlement,*

- *Supporting the incremental establishment of small local convenience offering or amenity node consistent with community services, and appropriate to each individual settlement and its character.*
- ...' (p44)

13. If further residential growth of the Bannockburn is required during the life of the Operative District Plan, it is appropriate that infill with more intensive Mixed Use or Medium / Low Density Residential Zones would likely be prioritised before extending LLRZ further into greenfield areas, including the Subject Site. This would be a more acceptable response from a good urban form perspective, likely providing greater benefits of housing choice, transport accessibility and amenities within the existing settlement.

Location of expansion

14. Secondly, if the Hearings Panel considers expansion of Bannockburn is acceptable, this section discusses the appropriateness of the proposed location and its edge definition from an urban design perspective.
15. Mr Lunday has identified a 'Natural Town Growth Area' based on constraints mapping (Figure 1). Sieve mapping of various constraints layers is a well-recognised urban design method to identify potentially developable land. Although avoiding LUC 1 - 3 soils have been relied on as a valid constraint for development under National Planning Standard – Highly Productive Soils (NPS-HPS), it is noted that the Council's recently endorsed Vincent Spatial Plan also incorporated LUC 4 - 6 soils into its constraint mapping, which is understood to be suitable for irrigated viticulture and horticulture (e.g. stone fruit) production in Central Otago, and would need further consideration if this submission were to proceed.

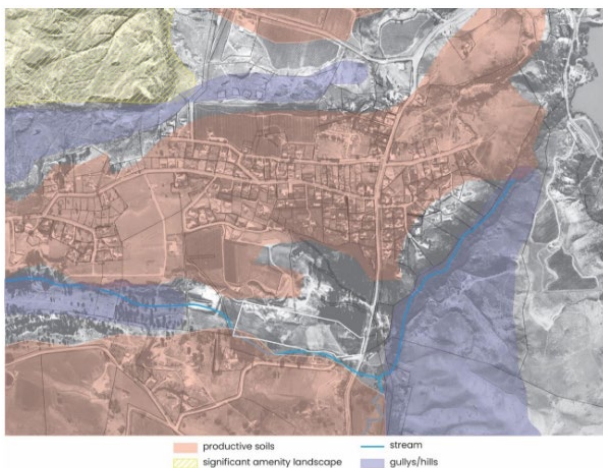


Figure 7: Growth Boundary Constraints (CGS, 2023)



Figure 9: Natural Town Growth Area Based on Constraints Mapping (CGS, 2023)

Figure 1: Outcome of a sieve mapping approach identifying opportunities for urban expansion along Bannockburn Road.

16. Identifying readily developable land through constraints mapping is an acceptable starting point. Although, it needs to be complemented with further urban form analysis to understand the close relationship between land use densities and accessibility levels, as indicated by Mr Lunday (para 44). It is appropriate that Mr Lunday (para 46) and Ms White have both identified the southern corridor either side of Bannockburn Road for potential extension of the settlement. This would maintain a compact settlement along key movement routes that have the potential to support greater access choices, such as use of active travel modes (walking / cycling). Ms White describes this well below:

'From an urban form perspective, I generally consider the sites to the south to be a logical area for an expansion to the boundary of the Township. I consider that zoning which 'infills' or provides a consistent urban/rural boundary to the south is most preferable, and that in general, zoning further towards the west is less preferable as it extends the township further in this direction rather than consolidating around the existing urban area.'...' Given the large amount of land sought to be rezoned, even with the anticipated shortfall, zoning all the land sought is likely to be

more than necessary to meet the demand and therefore further consideration would need to be given to how much land should be rezoned, and therefore which of the land parcels are the “best” location for such growth.’ (s42A Para 111)

17. The appropriateness or otherwise of a logical defensible boundary, assumed to be the Smiths Gully waterway, is not clear in Mr Lunday’s evidence. However, the location of the Subject Site at the outer margins of a comfortable walkable catchment (800m / 10min) from the ‘Main Street’ commercial activities within the settlement is acceptable, particularly relative to other LLRZ in Bannockburn (and across the District).

Approach to expansion

18. Thirdly, should the extent and definition of the ‘Natural Town Growth Area’ be accepted by the Hearings Panel from an urban form perspective, the next consideration is the effective integration of the Subject Site into its urban or rural context.
19. A structure plan has not been proposed for the urban extension of the Bannockburn settlement that from an urban design perspective would require holistic consideration of all other sites with the identified growth area (Figure 2). Only the Subject Site and adjacent Davies properties have been incorporated, as best illustrated in Mr Lunday’s concluding Nolly map.



Figure 9: Natural Town Growth Area Based on Constraints Mapping (CGS, 2023)

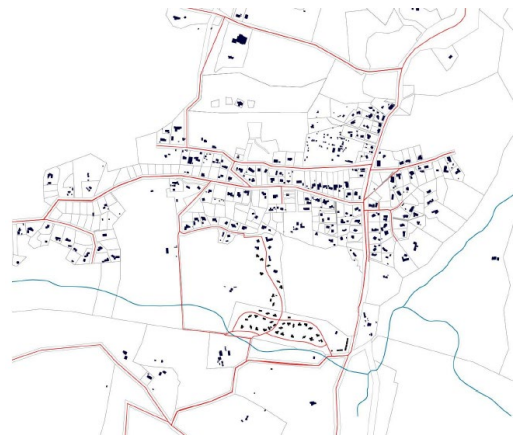


Figure 17: Nolly of Bannockburn with Southern extension inserted (CGS, 2023)

Figure 2: A contiguous extension of town is not apparent in the potential spatial pattern proposed by the submission.

20. Mr Lunday appears to support establishing a rural ‘Hamlet’ or cluster development concept that focuses on a smaller proportion of this available growth area, which is the focus of the Structure Plan provided in his evidence. However, it is noted on the Nolly map, included in Figure 17 of Mr Lunday’s evidence, that it might also anticipate utilising the Davies land as a future development corridor linking the proposed hamlet back into the settlement. The proposed land use zoning of this development has not been included in the proposed Structure Plan either. It also appears from this and the Indicative Masterplan that the proposed active travel route in this location would need to become a road alignment, if included.
21. From an urban design perspective, the proposed approach in the submission is likely to be both inconsistent with the clustering approach supported by Mr Lunday and less optimal than utilising a potential development corridor along Bannockburn Road. In either instance, Mr Lunday’s favouring of a cluster approach is likely to undermine the potential for other more contiguous development of this southern extension area in the future. It is generally more manageable to progressively stage urban growth into undeveloped land than infill existing development, particularly if recently developed. Otherwise, it typically results in more cellular and piecemeal growth patterns that are not optimal.
22. Mr Lunday outlines in his evidence the qualities of a best-practice hamlet developments (paras 50 - 54), including use of a case study with comparative modelling of rural growth with a presumably isolated, ‘Conventional Subdivision response’, which he regards as less sustainable, spanning through to a ‘Rural Village approach’ that is identified as more sustainable (Figure 3). While acceptable, the Indicative Masterplan based on the standalone, Subject Site does not appear to neatly fit with any of the

three models illustrated and is most likely to be a hybrid approach sitting between 'Conventional Subdivision' and 'Bush Cluster' approaches. Even if included within the broader, undeveloped Davies Site, this would unlikely fully achieve the 'Bush Cluster' approach, as discussed further in the next section below.

23. The proposed Draft Structure Plan and Indicative Masterplan, as currently presented in Mr Lunday's evidence, are not likely to achieve either a well-integrated part of the southern extension to the town or a more sustainable, self-contained hamlet. While both approaches may be able to be achieved through a Structure Plan for wider extension area and / or a Comprehensive Design for the Subject Site, respectively, the current proposal achieves neither satisfactorily and appears more of a 'halfway house' from an urban design perspective.

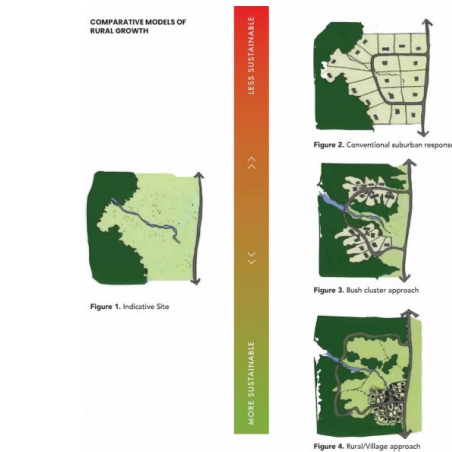


Figure 10: Cluster Model (CGS, 2009)



Figure 16: Indicative Masterplan (CGS, 2023)

Figure 3: The Indicative Masterplan is unlikely to achieve a 'more sustainable' cluster model outcome compared to those identified as best practice by Mr Lunday.

24. If a hamlet or cluster development approach was to be considered acceptable by the Hearings Panel, it is notable from the various historic maps referenced in Mr Lunday's evidence (Figure 4), that no other clusters of development or accessways have previously been recorded as existing on the Subject Site, other than a single dwelling. If a 'cluster' or 'hamlet' approach were to be established for a settlement, it would be a typical urban design approach to expand on existing clusters rather than establish a new one. A review of these historic maps and existing pattern of development, there appear to be other established clusters and / or access ways that there are likely to be more suitable candidates before consideration of the Subject Site is appropriate, such as the adjacent on southern side of Smiths Creek associated with the Old School.

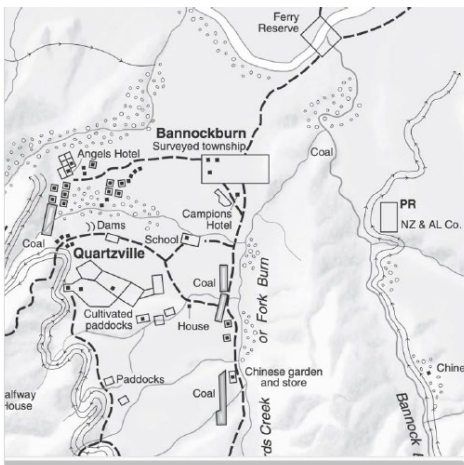


Figure 3: Map of Bannockburn 1878, (DoC, 2004)

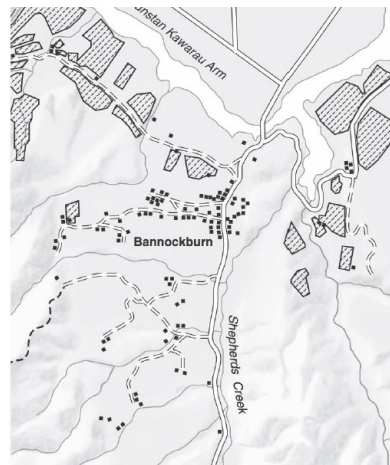


Figure 4: Settlement and vineyards 2003, (DoC, 2003)

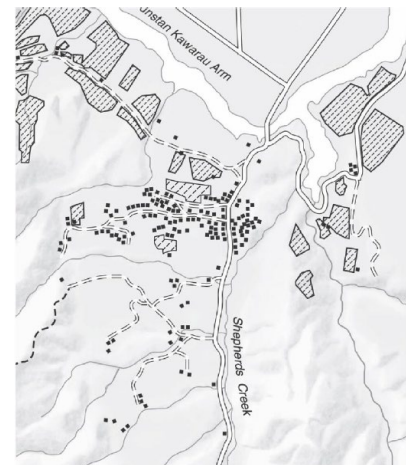


Figure 5: Settlement and vineyards 2023, (CGS, 2023)

Figure 4: Morphology of Bannockburn maps illustrating that no clusters of development or accessways have previously been identified on the Subject Site

25. From an urban design perspective, with valid alternative urban form options needing to be considered and wider community perspectives to gain, it is more appropriate to go through a more rigorous spatial planning process to identify optimal outcomes for Bannockburn and via a submission process, as acceptably indicated by Ms White below:

'While I consider that the servicing constraints mean that additional land to the south and west of the Township should not be rezoned through PC19, given the shortfall of land in Bannockburn, I consider that the Council may wish to revisit the zoning of land in Bannockburn, for example through a further township-specific Spatial Planning exercise.' (s42A Para 123)

...

'This would allow for more detailed consideration, and community input into, what areas are rezoned for residential and potentially commercial development, including consideration of whether higher density development is appropriate in some areas. It would also more specifically consider the likely amount of demand and ensure an appropriate amount of supply, and well as allowing for integration with infrastructure planning that would be required to overcome the current servicing limitations. Such an exercise would also ensure proper consideration and application of the direction in the NPS-HPL, in terms of: clearly determining the development capacity required to meet expected demand and how this is provided for; considering a range of options for providing the required development capacity, to determine which are the most practicable and feasible options; and considering the benefits of rezoning options against the costs associated with the loss of highly productive land for land-based primary production.' (s42A Para 124)

Proposed Structure Plan / Masterplan and Amended Provisions

26. Fifthly, if the Hearings Panel considers a clustered development is acceptable, this section discusses the appropriateness of the proposed structure plan / masterplan outcomes and amended provisions.
27. Notwithstanding its current isolation relative to the Bannockburn settlement, the draft structure plan provides three access points along its internal boundaries, which can appropriately future proof connectivity to adjacent sites should they be developed at later stages (Figure 5). The 'Community Hub' on Hall Road has been identified by Mr Lunday as a key destination (para 46). However, the existing and proposed pedestrian / cycle link / routes identified to the west and north provide indirect and lengthy access (c1300m), via Lyn Lane at the western end of the township, to this, despite it being in relative proximity directly to the north of the Subject Site (c200m). Given Mr Lunday's discussion on the integration merits of Bannockburn Road, referencing Hillier's Space Syntax theory, no provision has been made in the Draft Structure Plan for active travel routes along this road corridor that could more effectively access both community and commercial activities he has identified in the settlement.

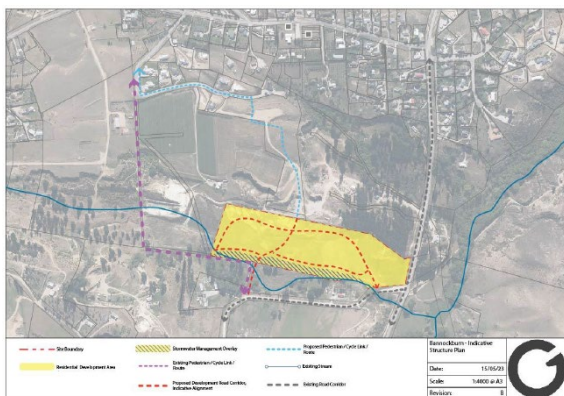


Figure 14: Draft Structure Plan for Klevstul Land showing connections to Town and beyond.



Figure 16: Indicative Masterplan (CGS, 2023)

Figure 5: Structure Plan does not clearly illustrate key elements of sustainable cluster development identified by Mr Lunday in the Indicative Masterplan, the likely distribution of private and common land or a logical / clearly defined defensible edge.

28. The Draft Structure Plan illustrates a 'Residential Development Area' across the entire site with inclusion of a hatched 'Stormwater Management Overlay'. This does not clearly define the key elements of sustainable cluster development, likely distribution of private and common land or a logical / clearly defined defensible edge discussed by Mr Lunday in his evidence (paras 69, 73 and 76).
29. Typical clustering approaches tend to be more tightly packed with internal public frontages to a common access way and private backs broadly radiating out, offering opportunities for social interaction and shared infrastructure internally with a sense of openness and landscape continuity externally. This can be an appropriate approach to comprehensively designed larger, isolated sites. However, the Indicative Masterplan appears to have a relatively even distribution of houses spread across the rectangular Subject Site with internal boundary setbacks not noticeably wider than separation between houses internally. As such, it is hard to identify how the proposed cluster approach discussed in Mr Lunday's evidence (paras 50 - 54) can be genuinely achieved without reducing yield or relying on the adjacent sites either remaining undeveloped or at least underdeveloped. Should this same pattern of development continue across adjacent sites, then it would be less of a cluster pattern and more consistent with other LLRZ outcomes, albeit boundary treatments would be less defined and slightly denser. As such, it is difficult to peer review the likely outcomes of the proposed rule amendments (i.e. minimum site area per residential unit is 400m² while maintaining an average across the precinct of 1,000m²) without these parameters illustrated.
30. Furthermore, the Indicative Masterplan identifies cottages along Bannockburn Road that appear to be more compact built forms than anticipated in the LLRZ or reflected elsewhere in the township and Mr Lunday notes that these could be adapted to commercial use in the future (para 69). These could be appropriate if the proposed 'Hamlet' approach was to be applied, but are neither appropriately zoned nor well-integrated with the other parts of the Subject Site.

Response to Plan Change 19 Objectives and Policies

31. Mr Lunday has outlined PC19 Objectives and Policies in his evidence (paras 58 and 59, respectively). Of those listed, the most obvious challenge for the proposal is addressing the 'well designed and **well connected into the surrounding area**' within the LLRZ Objective and corresponding Policy '**provides safe and appropriate access** and on-site parking' (emphasis added). These challenges have extensively addressed in the discussion above. Otherwise, other Objectives and Policies applicable to the LLRZ have the potential to be achieved, based on the limited information provided and an opportunity for the Submitter to carry out further design development.

Conclusion

32. Boffa Miskell have been engaged by Central Otago District Council to peer review Mr Lunday's Urban Design evidence on behalf of the submission made by Rowan and John Klevstul (#163). The submission seeks that approximately 22.2ha of land to the south of Bannockburn be rezoned from Rural Resource Area to LLRZ, with a precinct applied to allow for an average allotment size of 1000m², or lower where the urban design principles outlined in a "Rural Hamlet Vision" (attached to the submission) are given effect to, and for a development area plan/structure plan to be included in the District Plan.
33. It was noted that Cromwell township will likely accommodate most of the growth across the Cromwell Ward. Nonetheless, the peer review concluded that if any growth was to occur it would be most appropriate to reinforce the key features listed in the Cromwell Spatial Plan's section on 'Settlements within the Basin', including initially focusing on more intensive residential infill before extending LLRZ further into greenfield areas, including the Subject Site.
34. Should Bannockburn's expansion be supported by the Hearings Panel, it is appropriate that Mr Lunday and Ms White have both identified the corridor along Bannockburn Road to the south of the town. The location of the Subject Site is at the outer margins of a comfortable walkable catchment (800m / 10min)

from the 'Main Street' commercial activities within the heart of the township, which is acceptable relative to other LLRZ in Bannockburn (and across the District).

35. A structure plan has not been provided for the whole expansion area within the submission. Even if this had been provided, an extension of this scale, the range of alternative urban form options needing to be considered and the importance of gaining wider community perspectives indicates that it would be more appropriate to go through a more rigorous spatial planning process to identify optimal outcomes for Bannockburn. Furthermore, the peer review found that Mr Lunday's favouring of a cluster approach for the Subject Site is likely to undermine the potential for other more contiguous development of the proposed expansion area in the future.
36. The Draft Structure Plan does not clearly define the key elements of sustainable cluster development, likely distribution of private and common land or a logical / clearly defined defensible edge discussed by Mr Lunday in his evidence. It is difficult to see how the proposed cluster approach discussed in Mr Lunday's evidence can be genuinely achieved without reducing yield or relying on the adjacent sites either remaining undeveloped or at least underdeveloped. Moreover, if a hamlet / cluster development approach were to be established for a settlement, it would be a more appropriate urban design approach to expand on existing clusters rather than establish a new one as proposed.
37. Of the relevant PC19 Objectives and Policies listed in Mr Lunday's evidence, the most obvious challenge for the proposal is addressing the 'well designed and well connected into the surrounding area' within the LLRZ Objective and corresponding LLRZ Policy that 'provides safe and appropriate access ...'.
38. In summary, the peer review of Mr Lunday's evidence finds that several cascading premises on growth planning and urban form outcomes have been made where there are likely to be other, more appropriate outcomes from an urban design perspective at each step. As such, the proposed Draft Structure Plan and Indicative Masterplan, as currently presented within the submission, are not likely to achieve either a well-integrated part of the southern expansion to the Bannockburn or a more sustainable, self-contained hamlet more independent from the settlement. While both approaches may be achievable through a Structure Plan for wider expansion area or a Comprehensive Residential Development for the Subject Site, respectively, the current proposal within the submission achieves neither satisfactorily and is more of a 'halfway house' from an urban design perspective.