

BEFORE CENTRAL OTAGO DISTRICT COUNCIL

IN THE MATTER of Proposed Private Plan Change 13 to the Central
Otago District Plan

REQUESTOR **RIVER TERRACES DEVELOPMENTS LIMITED**

**EVIDENCE OF MARILYN HIGHT BROWN
FOR
CENTRAL OTAGO DISTRICT COUNCIL (FURTHER SUBMITTER # 506)
AND
GREG AND VIVIENNE WILKINSON (SUBMITTER #396)
Dated 20 MAY 2019**

1. INTRODUCTION

- 1.1. My name is Marilyn Hight Brown. I am an urban planner and hold a BA in Geography and a post graduate Diploma in Town Planning. I am a member of the New Zealand Planning Institute, and an affiliated member of the New Zealand Institute of Architects. I held certification as an Independent Commissioner between 2008 and 2016. I have over 30 years' professional experience gained in New Zealand and California, in local and regional government, and the private sector.
- 1.2. I am a director of NM Associates Ltd (NMA), a multi-disciplinary practice established in 2001. Prior to company inception both NMA directors practiced as NM Associates (partnership) and Resource Planning Associates Ltd, a company associated with Peddle Thorp Architects (Wellington). Attachment 1 contains a more detailed description of my work experience.
- 1.3. NMA, in association with Tract Consultants PTY Ltd (NMA Tract) were commissioned by Central Otago District Council (CODC) to undertake the Spatial Framework work stream to the Cromwell "Eye to the Future" Masterplan (CMP); essentially to evaluate how and where to accommodate growth over the next three decades (to 'Cromwell 2050') and to make a series of recommendations in that respect.
- 1.4. I was the team lead for the Spatial Framework and the principal author of the recently completed Urban Planning and Design Report (UPDR).
- 1.5. The Cromwell Spatial Framework is one of a number of urban design, growth management studies and masterplanning projects NMA and predecessor practices have undertaken in Central Otago, and in various other South Island locations, over a period of over 25 years, witnessing significant land use change, tourism and economic growth locally and regionally during that time.
- 1.6. Work on the Spatial Framework progressed in various stages May 2018 - to March 2019, concomitant with the overall CMP process. The stages included:
 - establishing a Vision and guiding Principles
 - a programme of community engagement
 - a series of assessments of growth options,
 - a spatial framework for Cromwell, including detailed precinct planning for the town centre and the Memorial Hall/Old Cromwell area.
- 1.7. The UPDR and draft Business Case to the CMP are not currently public documents. The recommendations, for the Spatial Framework are to be considered by the Cromwell Community Board on 29 May, 2019. The updated status of the Spatial Framework will be advised to this Hearing following the meeting.
- 1.8. The Spatial Framework (as a methodology) provides high level strategic direction and is the basis upon which to consider next steps and implementation pathways, including either Council-initiated Changes or other Review processes to update the Central Otago Operative District Plan.
- 1.9. Together with a number of other assessments of development potential in the Cromwell area the NMA Tract analysis described in this evidence included consideration of Proposed Plan Change 13 (PPC13) for a River Terrace Resource Area residential zone, the economic assessment by ME Consulting and the Jasmx Design Report.

2.0 CODE OF CONDUCT

- 2.1. I have read and agree to abide by the Environment Court's Code of Conduct for Expert Witnesses as specified in the Environment Court's Practice Note 2014. This evidence is within my area of expertise, except where I rely upon the evidence of other expert witnesses as presented at this hearing. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed.

3. SCOPE OF EVIDENCE

- 3.1. This evidence:
- summarises the CMP and Spatial Framework process, and geographic extent
 - confirms the non-statutory status of the Spatial Framework
 - addresses the assessment and findings made by NMA Tract as to the potential urban capacity to accommodate growth
 - evaluates the relationship of the Spatial Framework to PPC13
 - concludes that PPC13 would significantly affect the strategic direction of the Spatial Framework, and of future amendments and Review process to the District Plan.
- 3.2. I concur with the analysis and findings of the Section 42A report, and Mr Whitney's recommendation to the Hearing Panel to decline the PPC13. I cross reference these matters below.
- 3.3. Attachment 2 comprises the figures and graphics referred in this evidence.

4.0. THE CMP AND SPATIAL FRAMEWORK PROCESS, AND GEOGRAPHIC EXTENT

4.1. The Spatial Framework and wider Masterplanning Programme,

- 4.1.1. The CMP Better Business Case framework and the allied Spatial Framework work streams are shown in **Figure 1**. I note that while this shows the CMP as aligning with the Annual Plan 2019/20, the study's significance in understanding and accommodating growth in relation to District Plan matters was clearly signalled in the Masterplan Establishment Report, the CMP tender documents, and CODC engagement processes.¹
- 4.1.2. The CMP programme progressed via a series of workshops including that for:
- Vision and Principles deliberations
 - the consideration of Long List opportunities for an overall spatial framework for Cromwell, and
 - more detailed precinct planning, Key Moves and Short List options.
- 4.1.3. Community and stakeholder engagement occurred at intervals throughout the process, leading to a preferred option. Overall the CMP process has thus been undertaken using an evidence-based approach, data and professional inputs, plus community engagement and feedback.
- 4.1.4. At each stage of the project NMA Tract prepared a range of materials based on urban planning and design best practice to:
- assist workshop deliberations of potential options for future growth
 - show the relationship to the CMP Vision and Principles
 - assist workshop and community engagement in assessing a range of residential density options and strategies to accommodate growth
 - illustrate strategic inter-relationships and the implications of Key Moves and the various Long List and Short List options.

4.2 Geographic extent

- 4.2.1 The CMP geographic extent is shown in **Figure 2**. The Area of Focus generally correlates to the existing urban area. The Area of Study extends within Cromwell's agricultural/horticultural/landscape frame to the west and south of the town, and also includes the outer settlements (being Bannockburn, Lowburn, Pisa Moorings, and Tarras). Note; Tarras not shown.
- 4.2.2. In this evidence the term 'existing Cromwell' is used to describe the town's urban extent, and the outlying settlements. This substantially correlates with the existing pattern of development and current urban zones shown in **Figure 3**. I do not characterise the low density development within the Rural Residential and Residential Resource Area (zoned RRA 2) in the area between Bannockburn Road and the Kawarau Arm as 'urban', as further referenced in the discussion at 4.6.2.

¹Cromwell "Eye to the Future Masterplan Establishment Report, prepared for CODC by Rationale, March 2018, Cromwell Masterplan Programme – Design Services Contract No: CON03-2018 and Cromwell Masterplan –Let's Talk Options Oct- Nov 2018.

- 4.2.3. The CMP Area of Study as related to the Cromwell Ward (being the Cromwell, Cromwell Rural and Outer Cromwell Area²) is shown in **Figure 4**.
- 4.2.4. Cromwell is not presently an 'urban environment' of over 10,000 people as defined by the NPS-UDC, and Policies PA1-PA4 relating to a supply of feasible, zoned and serviced land (as varying obligations in the short, medium and long term) are not considered applicable to PPC13. This is covered in 9.3.1 of the s42A Report.
- 4.2.5. Were the NPS-UDC to apply I concur with Mr Whitney's opinion that PPC *'will not provide for the environmental wellbeing of people, communities and future generations, having regard to established land activities that exist within the immediate environs of the site'*.
- 4.2.6. Cromwell's outer settlements are not considered part of a Cromwell **urban environment** as defined in the NPS UDC. This is because they are not part of a concentrated urban area, and thus are not 'in close proximity' or 'contiguous with' Cromwell.
- 4.2.7. Ms Hampson suggests that areas beyond urban Cromwell, (including the PPC13 zone) might be legitimately considered part of an 'urban environment'. This in a similar way to the QLDC Wanaka, Luggate and Hawea example mentioned at para 61. I disagree. Cromwell is very much a separate urban entity from its outlying settlements.
- 4.2.8. This correlates the community's identity as 'a town within the Basin': and urban containment being a cornerstone to that identity. As I explain below the scenario of a dispersed pattern of development to accommodate growth was rejected by the community in the engagement phase of the CMP.
- 4.2.9. The Spatial Framework, in exploring options to accommodate growth, has assessed yield on a number of sites considered appropriate for future development, including the outer settlements. This was a high level and strategic assessment to guide decisions on future zoning, including those for mixed use commercial/residential development and visitor accommodation. These matters are discussed in more detail in Section 6 of this evidence.

4.3. Cromwell Vision

- 4.3.1. The CMP Vision is to meet the challenge of future growth by;
"embracing opportunities that protect, share and enhance our 'World of Difference' values now and in the future".
- 4.3.2. Aspirations within the Vision include:
- *"an attractive, vibrant and thriving heart for Cromwell*
 - *accommodating growth in a way that delivers on Cromwell's landscapes and amenity values*
 - *enhancing how Cromwell functions*
 - *housing is affordable and available, and*
 - *[there is] a thriving and competitive local economy, supported by available resources"*.
- 4.3.3. The Vision and associated outcomes are inter-related to the Investment Logic Mapping results, the multi-criteria analysis and Better Business Case work streams.
- 4.3.4. Supporting the CMP Vision and Aspirations are some 13 Key Principles, numbered in order according to preferences expressed in the workshops conducted in the initial phases of the CMP process The Principles are:
- *1: protect and celebrate the valued landscape , conservation and heritage setting*
 - *2: celebrate the horticultural, viticultural and agricultural environment*
 - *3: foster increased diversity in housing choices*
 - *4: reinforce an authentic local character and identity*
 - *5: support a healthy, diverse and welcoming community*
 - *6: create compact and walking and cycling town*
 - *7: connect the town and community to the waterfront*
 - *8: revitalise the town centre to be attractive and lively*
 - *9: support an increased sport and recreation focus for the town*
 - *10: establish Cromwell as a creative town"*

² The Statistics NZ Area Units

- 11: embed a 'Smart Cromwell' approach to town growth and renewal
- 12: continue to grow Cromwell as a quality tourism destination
- 13: foster a resilient and balanced local economy".

Figure 5 shows the Principles graphically.

4.3.5. Both the Vision and Principles are closely related to the Central Otago World of Difference values: <https://www.aworldofdifference.co.nz/> I discuss these matters further in Section 7 of this evidence.

4.4 Short List Options

- 4.4.1 Following consideration of a number of growth scenarios a Short List of three options was derived for an overall Spatial Framework, the town centre and an arts culture and heritage precinct.
- 4.4.2 The Short List comprised the three scenarios referenced in paras 4.4.3 and 4.4.7 of this evidence, all of which need to be read in context one to another and across the short, medium and longer term.
- 4.4.3 The growth options were:
- 'Change focused within the Basin' (Option 1)
 - "Balanced town renewal and growth' (Option 2),
 - 'Growth focused within existing Cromwell' (Option 3).
- 4.4.4 The relevant pages included to the Discussion Document are shown as **Figure 6**. A side-by-side comparison of these options is shown in **Figure 7**. The corresponding implications for a spatial framework comprise **Figure 8**.
- 4.4.5 The options represent a series of scenarios/'straw men' to enable the community to compare and contrast the implications individually and collectively, to promote discussion in terms of the Vision and Principles, and to gauge preferences (if any) for 'Cromwell 2050'.
- 4.4.6 The descriptors for each of the options were worked through a number of times, it being difficult to capture both the complex analysis of the CMP and Spatial Framework process to that point, and the interdependencies 'within' each option in a succinct manner, while also enabling the community to understand commonalities and differences between scenarios.
- 4.4.7. In summary:
- Option 1 explored the implications of growth being spread across the Cromwell Basin's smaller settlements and in Cromwell's existing residential areas over the next 30 years
 - Option 2 explored increased concentrations of houses and residential growth, also incrementally expanding to the south of Cromwell over the next 30 years
 - Option 3 explored a greater concentration of housing in Cromwell over the next 30 years.
- 4.4.8. The growth options were also correlated with those for a town centre precinct and an arts, culture and heritage precinct (within an extended locale to the Memorial Hall). Thus growth option 1 was correlated with town centre option 1 and arts culture and heritage option 1 and so on.
- 4.4.9. In so far as it contemplates development south of the existing urban area Option 2 is perhaps the closest scenario to PPC13. There are however significant differences between the requested Plan Change and Shortlist Option 2. These are:
- the development scenario envisaged in the Bannockburn Rd and Bannockburn Rd/Pearson Rd locality is coded as 'incremental change' in the same manner as existing Cromwell, with the assumption being that more people would live in and around the town centre in a greater variety of housing choices, and that outer development would occur at lower densities only
 - incremental change in the Bannockburn Rd area is envisaged as associated with Cromwell's expansion in the longer term, over the next 30 years
 - development in the Bannockburn Rd/Pearson Rd would use secondary routes to accommodate vehicular traffic, consistent with Cromwell's traffic management strategy. Cycling accessibility would be gained via the recently upgraded Bannockburn Rd shared pathway, and would align with infrastructure provision between Cromwell and Bannockburn

- within existing Cromwell greenfield development is limited to the residentially zoned land east of SH6 and in the vicinity of McNulty Inlet: the only additional infill location being that of the 8.8. ha Freeway Orchard site south of SH 8, adjoining the former Top Ten Holiday Park.
- 4.4.10. The Option 2 scenario *excludes* development on the Golf Course and open space areas north of Neplusultra St. This compares to the recommended Spatial Framework in which the greater part of this area would be developed at medium to high densities, to an assessed low to high yield of 510-680 dwelling units, within a 5-10 minute walking distance of the town centre, in the short- medium term. I discuss the anticipated yield of the Golf Course (and other inner locations) In Section 6 of this evidence.
- 4.4.11. At para 7.6 of his evidence Mr Ray characterises both Option 1 and 3 as ‘*extreme*’. I consider this inaccurate and again note that the options for the Spatial Framework overall were correlated to those of options for the town centre and an arts culture and heritage precinct, thus creating an overall picture for people to explore and interrogate, before responding to the community survey.
- 4.4.12. At para 7.1 Mr. Ray states that “*from a strategic urban design/planning perspective Option 3 is the preferred conceptual direction however this concept is almost impossible to achieve...*” I hold a different view. The CMP has been process grounded in community using recognised placemaking processes, not a top down academic exercise. CMP Vision and Principles were established in a series of stakeholder workshops and the community have clearly expressed their views on what they consider should happen in the future. These views included limitations to housing development in outlying locations and the significance of the rural frame to residents and visitors alike.
- 4.4.13. To my knowledge there is a high degree of Council and community commitment to the strategic direction based on the preferred option and also by private and public sector landowners within greenfield and town centre locations. I do not agree with Mr Ray’s assessment that ‘*the future of the town beyond the existing urban area will inevitably be to the south*’. The community did not support this type of scenario, as included to Option 2.

4.5. The preferred option

- 4.5.1 The engagement process revealed the preferred option to be “Growth focused within existing Cromwell’, i.e. for a consolidated urban development with minimal change to the extent of development beyond the existing urban area and to the outer settlements.
- 4.5.2 Reasons given for the “Growth focused within existing Cromwell’ option included:
- growth was enabled in a manner supporting the renewal and vibrancy for town centre
 - higher density residential typologies enabled the town to remain compact and accessible
 - smaller settlements were able to retain their rural feel
 - correlations to the protection of productive land and unique landscapes
 - concerns about urban sprawl,
 - less traffic, promotes walking and cycling.³
- 4.5.3 The community thus perceived a ‘bundle of benefits’ associated with Option 3, being that the CMP is multi-dimensional i.e. not limited to spatial planning/locational land use considerations but also linked to visual, amenity, heritage and landscape factors considered fundamental to the ‘World of Difference’ brand/sense of place, and ongoing investment in the contributing sectors to the local and regional economy (including horticulture, agriculture, viticulture and tourism).
- 4.5.4. As mentioned earlier the NMA Tract recommendations to CODC in respect of a Spatial Framework based on the preferred option are to be considered by the Cromwell Community Board on 29 May. A finalised Spatial Framework can then be made available as to future land use and precincts. This information includes Key Moves for nodes, activity and connectivity elements, landscape and open space features and places for people features.
- 4.5.5 In the interim the description below summarises features of the Spatial Framework and growth management strategy underpinning the Preferred Option.

³ CODC ibid

4.6. Key elements of the Spatial Framework

- 4.6.1 Cromwell's urban boundary is located east of SH6, and lies to the north of Cemetery Road and the Chaffer Beetle Reserve.
- 4.6.2 A low density residential/quasi-rural residential area extends between Bannockburn Rd and the Kawarau Arm south of land adjoining the Otago Polytech Central Campus. This acknowledges the existing housing development in this area and provides for choice in lifestyle environments, consistent with objectives for elsewhere-retaining the productive environments, landscape and amenity values within the rural frame.
- 4.6.3 The Outer Settlement precincts correlate with the extent of the current zoning for these areas.
- 4.6.4 The PPC13 zone is located within the outer rural frame to the Spatial Framework.
- 4.6.5 An important component of the Spatial Framework is a mixed use town centre wherein retail, office and civic facilities are co-located with apartments, top shops and other typologies, providing resident and non-resident accommodation (including that for seasonal workers).
- 4.6.6 NMA Tract considers that a mixed use central Cromwell is a reasonable expectation, given economic growth, the attraction of significant public realm, services and facilities, and as an attractive alternative to Queenstown.
- 4.6.7 The function of Cromwell as a visitor destination is also expected to become more significant, particularly when the Otago bike trails are linked Queenstown- Cromwell, Wanaka-Cromwell and Cromwell-Clyde and there is further growth in viticulture and horticulture, and as attracted by facilities in an Arts and Culture Precinct.

5.0 **NON-STATUTORY STATUS OF THE CMP**

- 5.1 The CMP is a non- statutory document.
- 5.2 The Spatial Framework and other urban planning and design recommendations will need to be implemented via District Plan, Annual and Long Term Plan processes, and in actions and initiatives by sector agencies, public and private investment, and community support. The inter-relationship between the CMP and the statutory planning regime is shown in **Figure 9**.
- 5.3 In my opinion, the CMP processes to date constitute a significant 'building block' in planning to accommodate future growth, and the Spatial Framework is appropriately recognised in that context. In saying this I note that the CMP and Spatial Framework correlates with the use of other recognised planning methodologies to assess and guide future growth and development, including 'structure planning', 'concept planning', 'growth management studies', and more latterly growth modelling in the context of the National Policy Statement on Urban Development Capacity 2016.
- 5.4 The Spatial Framework also provides reference for the s32 RMA process.
- 5.5 As explained in Section 7, PPC13 does not accord with the Spatial Framework. Thus if the Plan Change proceeds it would conflict with the Preferred Option and recommended strategic direction to:
- accommodate growth within the existing Cromwell urban area, promoting a well-connected and walkable community
 - significantly consolidate development within and nearby the town centre, being the community heart foster a mixed use, multi-functional town centre in a combination of retail, office and other commercial premises, residential and civic facilities and spaces and to
 - enable visitor accommodation, further recreational, cultural, tourism, open space and amenity environments and associated public realm upgrade within a series of conveniently accessible activity nodes.

- 5.6 PPC 13 would enable substantial urban growth (to a cap of 900 dwellings) within the rural frame, potentially creating precedent for other urban development to adjoining and nearby land. I agree with the conclusion reached by Mr Whitney at para 7.14 of the s42A report. I also agree with his statement that *“it is clearly anticipated in the request documentation that urbanisation will occur beyond the RRTRA”*.
- 5.7 Urban planning and urban design is not static and needs to be adaptive over time. Therefore further information and decision-making has the potential to alter the finalised Spatial Framework in the context of District Plan and Long Term Plan processes, and other implementation.
- 5.8 The Spatial Framework provides a considered strategy to accommodate growth in a way that enables a layering of benefits, consistent with a consolidated urban form, enhanced connectivity, a walkable community and other best practice implementations.
- 5.9 A number of submissions on PPC13 refer to concerns about the impact of PPC13. These include its relationship to the CMP and the community’s preference for consolidated development, the PPC13 rural location and context, and reverse sensitivity matters. These issues, and mitigation measures by way of structure planning, subdivision and development controls, and no complaint covenants are addressed in section 7.9 to 7.14 of the s42A Report. With the exception of conclusions noted at 7.17 (in respect of the potential for industrial land use on the subject site) I agree with Mr Whitney’s analysis of these matters and the conclusions reached.
- 5.10 The demand for industrial land is accommodated within the Spatial Framework by a contiguous area of some 34ha. I also note that two other matters are also likely to appropriately accommodate industrial sector growth:
- office and professional service space relocating out of the McNulty Rd area to a revitalised town centre with significant public realm improvements,
 - infill and more intensive use of current titles, improving efficiencies in site usage in areas now characterised by ‘internalised’ vacant space.
- 5.11 In my view, while urban usage/zoning on the PPC13 site would create precedent land use effects described by Mr Whitney, such effects would accrue whether the land was developed for urban industrial, residential or commercial purposes. I therefore concur with Ms Hampson’s conclusions at para 68 and 71.
- 5.12 Once urban development occurs all options for other activities are precluded.
- 5.13 The urban development of PPC 13 (including potentially other land to the south) would create an isolated residential community and dispersed pattern of development. The Cromwell community have recently considered such a scenario and have stated their preferred option to be that of consolidated development and urban containment. This correlates with the CMP Vision and Principles and the significant sense of place and economic values associated with Cromwell’s rural frame, and as also associated with minimal residential growth to the Bannockburn, Pisa Moorings and Lowburn.
- 5.14 The Spatial Framework reflects these preferences. It does not include a southern settlement, or urban expansion in the manner suggested by Mr Ray (para 7.30 of his evidence).
- 5.15 Mr Ray considers Highland Park and the Speedway to be non-rural activities and accordingly part of the urban fabric of Cromwell. I hold a different view; that Highlands Park, the Speedway and associated facilities are commercial recreation activities consented on the basis that there were suitably located within a rural environment. I do not therefore consider these facilities to be part of the urban fabric of the town, noting that part of the attraction and commercial success is that they are ‘out of town’.
- 5.16. That said Highlands Park is part of the town approach from the west along SH6 marking emergence from the Kawarau Gorge, and one of a number of rural contextual elements to the Cromwell welcome. Other elements include the traditional frame of mature plantings, orchards and vineyards and other rural views.

- 5.17 I agree with Mr Whitney's conclusion (7.2.11 of the s 42A Report) that PPC13 will result in a substantial residential area in a location that is remote from the Cromwell urban area, the town centre, community facilities and schools. This contrasts with the excellent levels of connectivity and accessibility available within Cromwell, (refer **Figure 10**) and established urban design principles which promote integrated urban environments.
- 5.18. While greenways and other open space areas, together with a neighbourhood convenience centre are included to the PPC 13 proposals⁴, these are facilities internal to PPC13 zone. In my view connectivity between the site and Cromwell is such that most residents will travel by car, along SH6.
- 5.19 The PPC 13 site is approximately 7.1km via SH 6 from the town centre and approximately 4.9km from the town centre via Bannockburn Rd/Barry Ave. The degree of physical separation between the PPC 13 site, the Cromwell Town Centre and other community and facilities is shown in **Figure 3**.
- 5.1.7 I conclude that PPC13 does not enable effective integration with adjoining urban and rural environments in the strategic and co-ordinated manner intended by Objective 4.5 of the Partially Operative Regional Policy Statement: (as referred 9.3.5 of the s42 A report)⁵, or that of the Spatial Framework.

6. ASSESSED POPULATION AND HOUSEHOLD GROWTH WITHIN THE 'CROMWELL 2050' PLANNING PERIOD.

- 6.1 In considering how and where to accommodate future growth NMA-Tract undertook a three- pronged assessment:
- an initial familiarisation of residential areas within Cromwell and the outer settlements
 - population and household indicators of the assessed demand for new housing
 - assessed yield based on existing zoning and 'churn' (as in estimated redevelopment)) and other potential development scenarios.

6.2 Existing residential development and contextual factors.

- 6.2.1 During the initial stages of the CMP project NMA- Tract observed;
- past and present residential development
 - the relationship and connectivity between residential areas, and the location of housing areas to retail and other business environments, community facilities and current infrastructure
 - residential infill and potential for further redevelopment
 - greenfield sites within and beyond the township
 - the nature and character of Bannockburn, Lowburn, Pisa Moorings and Tarras outer settlements.
 - other elements of the built environment, and public realm.
- 6.2.2 This evaluation included the Wooing Tree (Plan Change 12) site and the PPC13 site.
- 6.2.3 Other contextual factors within the CMP Area of Study and Area of Focus were also noted. These included landscape and amenity values, horticultural and other rural productive activities, seasonal changes, heritage values, legibility and way-finding, and Cromwell's setting both within the Cromwell Basin and to Lake Dunstan. Most of these factors are typified as World of Difference values. As referred at 4.3.3-5 of my evidence these factors underpin the Vision and Principles to the Spatial Framework.
- 6.2.4 The significance of the 'town within the Basin' and the interdependence of Cromwell's rural and urban economies was a common theme at the initial phase Workshops.
- 6.2.5 We also observed:
- Cromwell's unique morphology, such that residential areas are located within a series of overlapping 400-800m (5-10 min walking distance) radii of the town centre and other nodal points. This provides a distinctive level of urban connectivity and accessibility to shopping, living, employment and recreational environments, as well as to civic facilities and community services.

⁴ as shown on the Jasmax "River Terrace Illustrative Masterplan Design Report"., Dec 2017

⁵ Objective 4.5 states "urban a growth and development is well designed, occurs in a strategic and co-ordinated way, and integrates effectively with adjoining urban and rural environments"

- that a number of greenfield and public realm sites exist close to the centre of town
- urban residential zones under the Operative District Plan extend throughout Cromwell including to the north of SH8B and predominantly with a minimum site area of 250m². RRA⁶ 3 and RRA 4 sites at 4000 and 1000m² are located near the McNulty Inlet.
- lower density residential in a combination of Rural and Rural Residential zoning exist along the Bannockburn Rd in site sizes ranging from 4000m² to up to 1 ha. I consider this location a lifestyle environment rather than an area of urban development due to its relative isolation from other parts of the Cromwell urban area, and its containment between Bannockburn Rd and the Kawarau Arm/Lake Dunstan shoreline
- the majority of Cromwell's urban area lies to the north of the McNulty industrial area (**Figure 3**).
- This development pattern is reinforced by the existence of the Chaffer Beetle Reserve, Highlands Park and other rural areas north and south of SH 6.

6.3 Current residential densities and typologies.

6.3.1 Cromwell's urban morphology and residential areas can be typified as:

- Cromwell East: a distinctive grid pattern of development associated with the original Borough/township east of Barry Ave
- Cromwell West: the Waenga Drive locality and nearby areas, also with a distinctive street pattern, initially largely developed as hydro project housing and
- Cromwell North: more recent typologies in areas north of SH8B (**Figure 11**).

6.3.2 Characteristic densities are relatively low, with the impact of recent infill and more diversified typologies apparent in Cromwell East and Pisa Moorings: refer **Table 1**.

6.3.5 Assuming a cap of 900 dwellings PPC13 has an indicative gross density of approximately 18 dw/ha, and is thus at a level of intensification significantly above that for Cromwell's existing residential environments. This level of density (and above) is normally analogous with mixed use, centrally located living environments.

Table 1- assessed existing residential densities, CMP Area of Study 2018 (approximate only)

Approx. area /location	Dwellings	Approx. area (ha.)	Existing Gross Density Dwellings/ha.
Cromwell Urban Area			
Cromwell West residential*	630	150	4.2
Cromwell East residential	1390	160	8.7
Cromwell North residential	240	135	1.8
<i>Sub-total</i>	<i>2,260</i>	<i>445</i>	<i>5.1.</i>
Outer settlements			
Bannockburn	175	125	1.4
Lowburn	65	32	2.0
Pisa Moorings	480	75	6.5
Tarras	7	13	0.5
<i>Sub-total</i>	<i>727</i>	<i>245</i>	<i>296</i>
Totals:	2,987 Dwellings	690 ha.	4.33 dwellings/ha. Overall Average Density

6.4 Possible future densities

6.4.1 Some examples of infill density are illustrated in **Figure 12**. These examples show the impact of more diversified typologies on potential yield, and therefore provide correlation with the yield information discussed at section 6.6 of this evidence. The scenarios are shown as net densities to better illustrate what can be achieved on a site by site basis i.e. density is calculated excluding roads and open space.

⁶ Residential Resource Area

6.4.2 **Figure 12** shows possible infill in:

- *Cromwell East* @ 35dw/ha. This compares to the existing density @ 13.4 dw/ha, with a possible 26 dwelling units as 2-storey duplex, in place of 10 dwelling units
- *Cromwell West* @ 27 dw/ha. This compares to the existing density @ 12dw/ha, with a possible 20 dwellings as 2-storey duplex configuration, in place of 9 dwelling units
- *Cromwell North* @ 5.3 dw/ha. This compares to the existing 2.1 dw/ha with a possible 65 dwelling units as a mix of detached, 1-2 storeys and 2 storey duplex, in place of 26 dwellings.

6.4.3 The examples therefore reflect a hypothetical increase of more than 50% in the number of dwellings, in a range of typologies as additions to the existing urban fabric. We do not however anticipate infill development would occur at *blanket* ratios of this type across Cromwell and thus the low-high yields discussed below are deliberately conservative.

6.4.4 The infill examples differ substantially from the ME estimates. ME allows for some 80 units constructed as infill (at a rate of approximately 3 dwellings per year) during the period 2106- 2043. As demonstrated this not realistic, nor does it correlate with the Spatial Framework preferred option for containment of growth in outer settlements.

6.5. Cromwell growth projections and housing demand

6.5.1. The population projections for the Cromwell Ward 2018 -2048, adopting the SNZ 2013 'high scenario' projections indicate a population of approximately 12,000 persons towards the end of the Cromwell 2050 planning period.⁷ (**Table 2**)

6.5.3. An assessment of household growth in the short, medium to longer term is summarised in **Table 3**.

Table 2: Indicative household growth

Projected population and household and dwelling growth	2018	2028	2038	2048
Cromwell Ward resident popn.	7750	9450	10,900	12,150
Popn increase /decade		1,700 (170 p p/a)	1,450 (145p/pa)	1,250 (125 p/pa)
Estimated number of h/hlds*	3370	4295	4955	5523
Household increase p/decade		925 (c.92 hhlds. p/a)	660 (c.66 hhlds. (p/a)	568 (c.57 hhlds. p/a)

*Based on SNZ projection ratios for the Central Otago District of 2.3, 2.2 and 2.2 pp/household for 2018, 2028 and 2048 years; Subnational Household Projections by household type.

6.5.4. ME Consulting anticipates that additional dwellings will be needed on the basis of approximately 108 dwellings p/a in the period 2016-2028, and approximately 86 additional dwellings p/a if factored over the 2016-2043 period⁸. I make no judgement about this assessment: it is provided to enable comparison to the yield assessment below.

6.5.5. I do however note the demand projected is from year 2016, and have therefore discounted some 200 dwellings to correlate with the 2018 year, to take account of dwelling consents issued at a rate of approx.100 per year. As adjusted the assessment is then a total of 1096 dwellings to 2028,, or alternatively 2122 dwellings as the assessed demand 2018- 2043@ 86 dwellings per year.

6.5.6 This assessed demand is not dissimilar to that of the estimated household numbers shown in Table 2.

6.5.7. The Statistics NZ Subnational Population projections⁹ for the Central Otago District indicate that growth is anticipated predominantly as family and other multi-person households (@ approximately 75% of the total), single person households comprising the balance 25%.

⁷ Rationale *ibid*. The projections will be further assessed based on 2018 Census results

⁸ ME Consulting report p21

⁹ SNA Subnational Household Projections, by Household type 2013 base-2038 , released 27 October 2017

6.5.10 The results of the 2018 Census will enable comparison of population and household growth with the SNZ projections as they are currently understood, and provide further insight to residential demand factors, and key social and economic indicators. The Census results are also expected to confirm (or not) anecdotal evidence that Cromwell's residential growth includes young families attracted by residential and lifestyle choice, flatting groups, part time residents, increasing visitor numbers, and so on.

6.6 Future Assessed Residential Yield

6.6.1 Estimated yields and "churn" factors as assessed by NMA Tract are shown in **Table 3**. Greenfield locations are shown in **Figure 13**.

6.6.2 This information enables the correlation of the ME assessed demand for additional dwellings with yield anticipated in terms of the Spatial Framework.

Table 3 ; 'Cromwell 2050' – estimated residential yields

Residential site		Gross area (ha)	Efficiencies (varies approx. 75-80%)	Densities (dwellings/ha)		Possible yield	
				low	high	low	high
Existing Consents	Top 10 Holiday Park	2.6	10.1	actual 180		180	180
	Wooing Tree	25.5	20.4	actual 210		<u>210</u>	<u>210</u>
	Vineyard			(15)	(20)	(300)	(400)
						390	390
New Greenfield	Golf Course	46	34	5	20	510	680
	Freeway Orchard	8.8	7	10	15	70	106
	Sew Hoy Estate	27.5	22	15	20	320	440
	Gair Ave –Final	5	4	10	15	40	60
	Stage	4	3.2	10	15	32	48
	The Chalets	20	15	10	15	<u>150</u>	<u>225</u>
	North Cromwell					1122	1559
Town Centre Area sites	Northwest Sector and other locations	3.5	0.8-1.2	30	80	<u>132-</u>	<u>176</u>
				Subtotal		1,644	2,125
Possible churn/redevelopment to 2050	Cromwell East	140	105 @20%	15	20	315	420
	Cromwell West	120	90@ 20%	15	20	270	270
	Cromwell North	60	45@20%	10	15	90	135
					Subtotal		675
Settlements (est. undeveloped residential areas)	Bannockburn	35	28	4	5	110	140
	Pisa Moorings	8.5	6.8	10	15	70	100
	Lowburn	10	8	3	3.5	25	30
				Subtotal		205	270
				Totals		2,524	3,220
Assessed ME demand 2016-2028 (less est. 200 dwellings constructed 2016-2018)			<i>assessed 2028-2043</i>				
1096 dw to 2028 (Cromwell and surrounds)			1290dw	2386 alternative@86dw p/a 2018to -2048 2580			

- 6.6.3 If assessed at 1096 dwellings to 2028 (the short term) or 1290 dwellings for the years 2028-2043 the estimated yield accommodates the ME assessed demand, at either the low or high yields shown. At the lower assessment rate of 86 dw p/a 2018-2048 the estimated demand is c 2580 , falling between the low and high yield assessment .
- 6.6.4 Yield is achieved in a combination of existing consents, greenfield , infill and mixed use development at varying densities and enabling a range of typologies suitable for resident (including new households) and visitor needs.
- 6.6.5 Both the town centre and inner greenfield locations are anticipated to be developed via resource consent or Plan Change mechanisms based on precedent set in the development approvals for the Top 10 Holiday Park. These developments are occurring in accordance with the rate of market demand in various configurations including villa units and also introducing attached 2 storey apartment typologies for an increased variety in a housing choice.
- 6.6.6 These town centre and inner greenfield locations are expected to achieve densities at or above those of PPC13, enabling a range of typologies in close proximity to current urban facilities and amenities. Also enabling consolidated development as envisaged by the community in supporting for 'growth focused within existing Cromwell'.
- 6.6.7 They are within convenient distance to facilities within urban Cromwell, including lakeshore nodes, varied public realm, active and passive recreation facilities, thus offering numerous opportunities for social interaction by virtue of their location and contextual setting. This accords with recognised urban design principles for sustainable communities.
- 6.6.8 The infill component is an important contributor to accommodating growth and also enables development within the urban setting and urban fabric. Correlating with the other assessed yield locations, this development would take place in contiguous locations, creating efficiencies in the supply of facilities and infrastructures and upgrading Cromwell' housing stock.
- 6.6.9 The infill yield is significantly greater than that assessed by ME Consulting; the development with the outer settlements significantly less than ME's assessment.
- 6.6.10 The settlement yield in **Table 3** is calculated on the basis of the balance/remaining areas within the settlement zones: this correlating to the Spatial Framework Preferred Option to limit development in non-urban locations, the community's opposition to dispersed growth and the value (accrued in an economic and amenity sense) of Cromwell's rural frame.
- 6.6.10 Table 3 does not include yield for residential and visitor accommodation in the Arts and Culture precinct as there is further evaluation yet to be undertaken on detailed concept planning for the locality. The area is configured around a lakeshore/waterfront node and is anticipated to attract significant investment in mixed use, visitor, recreation and cultural facilities and associated residential typologies.
- 6.6.11 The assessed demand for additional dwellings can be met in a manner consistent with the Spatial Framework and the community's preferred option for urban containment. This would
- follow a normal process of infill and greenfield development, renewal and upgrade
 - is a continuation of current trends
 - promotes connectivity and accessibility in accordance with recognised urban design principles and those for integrated and sustainable management, in a way that complements the existing urban fabric, and efficiently uses and supports existing services and facilities
 - enables new residents ease of access to Cromwell's numerous facilities and to be integrated into the town, not at a significant distance from it to it
 - supports and is interdependent with the community's preferred options for a vibrant and mixed use town centre and other activity nodes, bringing a bundle of benefits
 - provides a range of housing typologies and diversity of living environments
 - supports the protection of the rural frame and associated Landscape and amenity values.

6.6.12 As to feasibility and achievability 'on the ground' there are a number of measures to be worked through over time; this situation being common to 'development' everywhere. I note that the Spatial Framework recognises and promotes wide-ranging implementation measures to effect and support planning and growth management, and coordinated actions within the private and public sector. To my knowledge Cromwell has a highly motivated community, with a diverse skill set, with the wherewithal to obtain specialist advice and skills sets as appropriate. These considerations/expectations were part of the community's support for the preferred option, and their aspirations for 'Cromwell 2050'

7. THE PPC13 PROPOSALS IN RELATION TO THE RECOMMENDED SPATIAL FRAMEWORK

7.1 Nature and character of the PPC13 proposals

- 7.1.1. The Jasmex Design Report and other documentation to PPC13 denotes the 49.4ha zone as that for residential and retirement living, with an integrated open space network and small neighbourhood convenience centre.
- 7.1.2 I would characterise the PPC13 proposals as a medium to high density residential environment which is "internally focused" by virtue of:
- its morphology and urbanised character
 - its character as a satellite community in a location well beyond Cromwell
 - the contextual rural setting close to significant horticultural/orcharding/other rural productive environments, and to the Highlands Motorsport complex and Speedway track.
- 7.1.3 Development on the PPC 13 site appears to be primarily intended for commuter occupancy (Mr Meehan at paras 52, 53 and 94, Mr Bretherton at paras 16 and 16, and Mr Carr at paras 6.2.1 and 6.2.2) In this regard Mr Carr estimates 80% of peak hour movements towards Queenstown, 25% towards Cromwell in addition to the vehicle movements associated with retirement housing.
- 7.1.4 PPC13 would, in effect, create a substantive satellite community isolated from Cromwell that is substantially car-dependent. The need for vehicle travel serves to further isolate residents of a PPC zone since practicable and convenient walking and cycling distances are not achievable, and to go north one must first go south.
- 7.1.5. Mr Ray holds the opposite view, citing potential walking and cycling options as connectivity elements and refers to a proposed off-road cycle way along Sandflat Rd to connect to trials along Bannockburn Rd. While I accept this would likely be attractive as a recreational route, if instituted, I don't consider this link a preferred 'desire line' for school trips, shopping etc. unless there are significant right turn delays at the Sandflat Rd/SH 6 intersection.
- 7.1.6 The possible cycle way links marked A and B on Mr Ray's the plan at page 16 appear to traverse land owned by others, Route A follows the transmission line corridor and crosses the Chaffer Beetle Reserve therefore I would anticipate entry restrictions for health and safety reasons (transmission corridor) and ecological values (Chaffers Beetle).
- 7.1.7 Mr Ray at para 7.33 states 'that Cromwell,, like most small NZ towns, relies on private vehicle trips for most errands".. This is not correct. The greenways are extensively used by young and old alike with schoolchildren biking, walking and skate boarding to school and shops, parents out with young children, trips to the dairy, dog walking and so on. The connectivity provided is much valued by the community, a matter that was emphasised during the Vision workshops.
- 7.1.8 While the PPC13 incorporates greenways within the site, so far as I'm aware there is no prospect of replicating these connectivity features beyond the site in a way that promotes the convenient accessibility characteristic of the urban fabric.
- 7.1.9 As a final point re connectivity a 5-10 min walking distance from PPC 13 (measured from mid-site) corresponds to the vicinity just past the SH 6 Cemetery Rd intersection, the middle of the orchards to the west and centrally within Highlands Park.

- 7.1.8 The comparative accessibility for the residents within Cromwell is shown in **Figures 3 and 10**.
- 7.1.9 Such connectivity is an important feature of Cromwell's urban fabric and a key element supporting accommodating growth in the manner proposed by the Spatial Framework.
- 7.1.10 Feedback at the CMP Workshops noted that commuter households can be absent for much of the day and therefore rely on services and facilities assisting families with child care, afterschool services, and participation in sports. These are social costs borne by wider Cromwell community and may also be replicated by needs associated with retirement age groups.
- 7.1.11 This demonstrates the importance of accommodating growth within an established urban environment where facilities are available and accessible (this also being recognised in the pastoral care/wellbeing obligations for employers of seasonal workers who accommodate workers in the township).
- 7.1.12 All incoming residents have the potential to create a number of benefits to a receiving community, including vibrancy and diversity. The environment to which they relocate should in turn have ready availability and accessibility to services and facilities and enable community integration. This applies to both physical and social environments, and across all age groups.
- 7.1.13 The site location and masterplan model encompassed to PPC 13 does not assist these parameters, and in turn demonstrates the importance of the connectivity and urban form enabled by the Spatial Framework.
- 7.1.14 So far as I am aware there has not been any analysis of social impact associated with the PPC 13 proposals, (which are potentially significant) or the mitigation thereof. I therefore conclude that PPC13 does not meet the needs of communities as envisaged in Section 6 of the Operative District Plan, or demonstrate social, economic and cultural wellbeing (as allied to sustainable management, Part 2, section 5 RMA) and as referred to in paras 8.2.2 and 9.4.2 of the Section 42A Report)
- 7.1.15 The desirability of accommodating growth within an existing urban environment is recognised as fundamental to good planning for communities. The growth proposed by way of PPC13 does not align with such underpinnings.
- 7.1.16. There are, in addition, other anticipated cumulative effects. PPC 13 would likely absorb the greater part of the assessed housing needs for Cromwell into the medium term (and possibly beyond if urban zoning were to be extended to the south) , thereby impacting on the community's preferred response to growth, and affecting the realisation of benefits that would otherwise accrue to the existing township. This is also a factor to considerations of sustainable management.
- 7.1.17 The estimated yields shown in Table 4 reflect both lower and higher yield scenarios, and are achieved across a variety of locations, using a combination of greenfield , town centre and infill opportunities. They enable a wide variety of housing types and typologies in established and renewed neighbourhoods.
- 7.1.18. Development within the yield locations accords with well-established planning and urban design principles for connectivity, accessibility and sustainability of existing urban environments. It correlates with an integrated strategy for public realm and other upgrades, and would assist in taking Cromwell to the next level of development in a manner supporting and extending existing facilities, and building further coherence to the existing and attractive urban fabric.
- 7.1.19 I note PPC13 is close to the entrance to the Kawarau Gorge and thus potentially a commuter suburb to Queenstown. Should satellite development occur at the western end of the Gorge, and on the Frankton Flats then a series of ribbon developments may occur in the long term. The distinctive and contained nature that currently exists for Cromwell would be lost, these factors including valued amenity, recreational and productive environments.

7.1.20 At the CMP Workshops community stakeholders reinforced that Cromwell does not wish to become a suburb of Queenstown and wishes to retain its unique and separate identity.

7.1.21 I concur with Mr Whitney's conclusion that PPC 13 has the potential to compromise the outcome of the CMP process.

7.2 Issues relating to reverse sensitivity

7.2.1 The PPC13 development is located in close proximity to horticultural activities to the north and south of SH6 whose land and commercial management legitimately creates noise effects and other disturbance impacts associated with spraying, harvesting, frost fighting and routine seasonal activities throughout the year. These activities include day and night-time operations.

7.2.2 Orchardling, in common with viticulture and other primary sector activities within the Cromwell Basin provides employment to local and international workers, and is a significant contributor to the New Zealand economy (including its export earnings). It is also a distinctive factor to the Cromwell community's much valued sense of place, and to local and regional tourism.

7.2.3 The PPC 13 site is adjacent the Highlands Motorsport Park and the Cromwell Speedway. Highlands Park is also much valued by the local community, and is a landmark facility known nationally and internationally. The consented activities for this site include motor racing, visitor and hosting events, and inward and outward helicopter flights.

7.2.4 The extent of permitted/consented activities occurring on adjacent and nearby properties are described by Mr Whitney in Section 7.10 of the s42A Report. This includes flight activity associated with crop spraying, and rural flight activity associated with the Cromwell Aerodrome Activity. The PPC13 site lies under approach path to the Aerodrome.

7.2.5 The site is adjacent SH6 with c 4000 2-way vehicle movements per day (2015 count); this traffic including ` stock trucks and distribution cartage associated with Cromwell's functions as a regional processing and distribution hub, and inter-regional commuter traffic.

7.2.6 These activities are cumulative and would comprise the receiving environment to an urban community of approximately 2000 people, including seniors. In the longer term it is possible this community may grow and extend to the south, as indicated by,

- the PPC13 roading pattern, Illustrative Master Plan and the Movement Plan
- 1000m² maximum site allowance applicable to titles at the site entry thus potentially for visitor accommodation or other commercial premises
- development within the proposed Open Space Area C and Education Overlay if surplus to school or other learning activities.

7.2.7 Any southern extension would also occur within and adjacent a rural setting.

7.2.8 The location of the PPC 13 site within the rural and commercial recreation environments described would create reverse sensitivity effects to those environments, potentially affecting day to day operations, and impacting on management efficiencies.

7.2.9 Reverse sensitivity effects are difficult to adequately address either by way of District Plan measures or specific mitigation, and pose problems for sustainable management of the natural and physical resources so impacted. I consider this a significant and recognised planning issue across New Zealand.

7.2.10 The exception to the problem of effective mitigation of reverse sensitivity impacts is where a proposed activity is of a short term nature such as an oil exploration site where drilling takes place over 4-6 weeks, and such measures as site containment and specific noise mitigation (both of the site and drilling infrastructure) is a practicable mitigation to unavoidable noise effects, and continuous 24-hr operations. Temporary accommodation can be made available to residents of nearby housing (if any) should they wish to relocate during drilling operations. Options of this type are not practicable solutions for the PPC 13 site, or (by virtue of its scale/extent), for its occupants.

- 7.2.11 PPC 13 includes an amended Rule 20.7.7 (viii) which provides for a no-complaints covenant to be registered against titles to prevent noise complaints against the Highlands and Speedway operations, this also signalling to intended purchasers the nature of the noise environment affecting the site.
- 7.2.12 At para 4.39 of his evidence Mr Brown suggests that the no complaints covenants are a similar, measure to District Plan Policy 13.4.11 which alerts (incoming residents) to adverse noise effects typical of rural zones. He concludes that no complaints covenants are a suitable mitigation measure as offset to the noise effects occurring within the PPC13 vicinity. He then notes: *the RTRA recognises the existing activities nearby and includes measures to avoid, remedy or mitigate the effects of these activities on residents within the RTRA*.
- 7.2.13 With respect this is inverse mitigation. Reverse sensitivity effects need to be addressed by adaptation of the new/incoming activity not the reverse. It is the new activity that must propose adaptive management. The Issue at hand is that an extensive residential development is proposed to be inserted into a long established rural environment. I do not consider the no complaints covenants; additional fencing and planting offsets realistically address these matters, and draw the conclusion that the PPC13 is not a suitable environment for extensive, medium high density residential development.
- 7.2.14 Mr Whitney observes a number of difficulties as to the appropriateness and effectiveness of no-compliant covenants, and I concur. He also states *'in [his] view incompatible land uses should be located such that conflict is avoided to the maximum extent practicable'*. I agree and note that the better planning approach, pursuant to Section 5 is, in my opinion, to accommodate like with like i.e. urban activities within urban environments and rural activities within rural environments.
- 7.2.15 The Spatial Framework acknowledges the significance of rural resources to the District and region, and provides for consolidated urban growth in locations convenient and accessible to the Cromwell's services and facilities. It enables greenfield and infill development where consistent with a consolidated urban form and higher density objectives, in locations contiguous with existing subdivision and urban development. This is consistent with recognised planning principles.
- 7.2.16 PPC 13 does the opposite, such that residential development on this site would directly conflict with the growth management strategy inherent to the Spatial Framework, and the Cromwell community's preferred option by which to accommodate growth.
- 7.2.17. The Spatial Framework also addresses the management of reverse sensitivity effects by segregating noisy and/or polluting industrial and commercial recreation uses , farming, horticulture and viticulture, and strategic infrastructure from residential and commercial environments. In doing so it recognises;
- established regional planning objectives (as referred para 9.3.5 of the s42A report)
 - key objectives and policies of the District Plan (as referred at 8.3 of the above report of the Rural Resource Area and expansion of urban areas.
- 7.2.16 I consider PPC 13 is at variance with the District Plan and the Partially Operative Regional Policy Statement 2019 measures referenced.

7.3 Visual values

- 7.3.1 The rural frame to Cromwell is highly valued by the community for its amenity, visual and landscape qualities, and for the employment and other economic benefits it brings to the town.
- 7.3.2 An important characteristic of the rural frame is that it assists containment of urban development, and in doing so protects 'World of Difference' values and brand, and retains the distinctiveness of Cromwell as a town within the Basin.
- 7.3.3. The immediacy of setting and connectivity to the rural frame is an important element to Cromwell's *urban* amenity, and 'welcome' within entry corridors.

- 7.3.4. The outlook over rural land from the outer settlements is a similarly important feature, integral to sense of place, and complementary to visitor facilities and attractions. Where overlooked roof forms and urban settlement of PPC13 site would replace what is now an expansive rural landscape. Night sky impacts would occur.
- 7.3.5 The PPC13 site is located within the southernmost “town entry’ corridor to the Spatial Framework. The entry corridors are a Key Move of the Spatial Framework, and signal wayfinding and pending arrival into Cromwell. The corridors are traditionally framed by tall poplars, other heritage plantings, orchards and vineyards and have significant amenity values. These values provide pleasant respite from travel, and for the many international visitors to the area, are in significant contrast to the dense, intensely urban settings of other parts of the world.
- 7.3.6 At Section 4.6.2 the ODP captures something of these matters in noting *“the unique landscape of the Central Otago District has been identified as an important resource of the District that is renowned internationally. Ensuring adverse effects on its values are avoided, remedied or mitigated is considered a significant resource management issue”*¹⁰
- 7.3.7 PPC 13, if approved, would replace the presently expansive rural environment of the site with an extensive and intensive area of urban development, on a gridded pattern of development with attendant built form and plantings. This would be in significant contrast to the surrounding area.
- 7.3.8 Something of the visual impact of PPC13 site to its surrounds is illustrated at page 31 of the Design Report albeit as a bird’s eye view from the south. This graphic shows the possible density and massing of the development proposed including typologies to Sandflat Rd and SH6.
- 7.3.9 Structures associated with proposed Open Space 2 Education overlay, the neighbourhood centre and centralised facilities within the Retirement Living (Sub Area A) are not depicted.¹¹
- 7.3.10. PPC 13 would enable a gradated height of structures N/S (i.e. beyond a 30m frontage setback to SH6), with a permitted building height of 9m within Area B and for parts of Area A, increasing to 12 m (3 floors) where Centralised Facilities and the Neighbourhood Centre are located. The permitted baseline for height in the Rural Zone is 10m.¹²
- 7.3.11 There is a 30m setback area to SH6 (Area C). This is described in the Design Report as landscape frontage¹³ with
- *“a unique blend of productive and native ecological plantings,*
 - *creates screen and setback from State Highway b*
 - *Builds on existing character of neighbouring sites and creates a productive gateway to Cromwell,*
 - *creates community resources that socially activates the*
 - *creates a unique identity, seasonal change*
 - *creates high quality frontage’*
- 7.3.12 The indicative open space typologies for Area B¹⁴ are then described as *“Northern site frontage incorporates native planting zones and productive orchard species. Small clearings and mown pathways provide informal recreation and picnic spaces. Potential to incorporate some small play equipment”*
- 7.3.13 The PPC13 proposals include a 30m setback to SH 6. This is consistent with the Spatial Framework setback.
- 7.3.14. It would therefore appear that the frontage is intended as both a recreation and buffer area, potentially with a number of gaps and with deciduous species (including fruit trees) losing their leaves over autumn and winter .

¹⁰ ODP page 4-28

¹¹ Refer Structure Plan, page 56 of the Design Report

¹² In the Rural Zone the expectation is of relatively few structures within the rural landscape. These would include a rural dwelling, out buildings packing sheds , hay barns etc.. Therefore comparison of the permitted height to the PPC 13 proposals does not compare like with like

¹³ Page 33 of the Design Report

¹⁴ Page 34 of the Design Report ‘Community orchard’

7.3.15 So far as I'm aware the PPC 13 documentation does not include detailed design for the frontage, or explore the potential for reverse sensitivity effects of buffer plantings to adjacent and nearby orchards or the mitigation thereof (e.g. the intended maintenance regime, pest control, disposal of fallen fruit etc. .Would these responsibilities fall to a Body Corporation, would specialist services be engaged to monitor and spray)?.

7.3.16 I consider PPC13 would have an adverse effect on the visual values to Cromwell's western corridor and associated contextual environment for the following reasons:

- it is of an inherently different character to surrounding activities.
- proposed buffer plantings have potential for reverse sensitivity effects and would not adequately screen views into the site and its associated built form
- an intense residential character would be emphasised by virtue of the gridded pattern of development the on-site intended plantings
- PPC 13 does not include elements which integrate the site with the surrounding area
- new stone walls, fencing and signage to SH 6 constitute site-specific placemaking elements, also differentiating from the contextual setting and World of Difference values
- buffer planting would not screen buildings within Area s A and B of the site.

7.3.17 I concur with Mr Skelton at para 45 where he describes the proposal as a 'patch of urban development in an area that is detached from the urban areas of Cromwell town'.

7.3.18 PPC 13 is located on major tourist highway and will be overlooked from the Bannockburn terraces and visitor facilities. There is no contextual relationship between PPC13 and surrounding areas.

7.3.19 I disagree with Mr Skelton at para ii that PCC 13 will have low adverse effects, further reduced when site plantings mature.

7.3.20 I agree with Mr Whitney that PPC 13 will create an island of urban development in a rural landscape, and that there will be significant adverse effects on landscape and amenity values as viewed from SH6.

7.4 Convenience retail centre

7.4.1 The Spatial Framework envisages a hierarchy of retail and business environments. In order of significance these are the Town Centre, Arts and Culture Precinct, and smaller neighbourhood facilities.

7.4.2 The PPC 13 proposals for a small convenience centre would correlate with this strategy.

8. CONCLUSIONS

8.1. The Spatial Framework to the Cromwell Master Plan establishes a high level strategic direction by which to guide and implement processes under the Local Government Act and the Resource Management Act.

8.2 The Spatial Framework is a non-statutory document. In my opinion however the CMP processes to date constitute a significant building block in planning to accommodate future growth and the Spatial Framework is appropriately recognised in that context.

8.3 The CMP and Spatial Framework correlate with the use of other recognised planning methodologies to assess and guide future growth and development including structure planning, concept planning, growth management studies, and growth modelling in the context of the National Policy Statement on Urban Development Capacity 2016.

8.4 The Spatial Framework and will be implemented to the Central Otago District Plan in a number of Council-initiated Plan Changes and/or the District Plan Review. It is a considered strategy to accommodate growth in a way that enables a layering of benefits, consistent with a consolidated urban form, a walkable and accessible community, among other best practice urban design and urban planning.

- 8.6. PPC13, if approved, would conflict with the CODC's strategic direction to:
- accommodate growth within the Cromwell urban area, promoting a well-connected and walkable community
 - significantly consolidate development within and nearby the town centre
 - foster a mixed use town centre in a combination of retail , office and other commercial premises, residential and civic spaces, a refreshed public realm and open space environment
 - develop a significantly scaled community, visitor and cultural precinct hub in the Old Cromwell bringing vitality, viability and diversity
 - enable greenfield development and/or infill opportunities where consistent with a consolidated urban form and higher density objectives in locations contiguous with existing subdivision and development and existing infrastructure
 - retain the productive capacity of rural areas, protecting rural land around the town and within the wider Basin acknowledging the significance of climate and other factors including localised growing environments , allied productivity outputs and GDP, and World of Difference values.
- 8.7 An analysis of potential growth throughout the 'Cromwell 2050' planning period indicates demand for a approximately 2153 dwellings. These estimates should be further analysed on the basis of the awaited Census release, changing household trends, rate of current development and construction. Similarly the yield estimates will need ongoing assessment as the development market changes and greater choice in typologies becomes available.
- 8.9 NMA Tract considered future yield created in the context of the Spatial Framework, and in accordance with strategic objectives for consolidated and contiguous development.
- 8.11 I concur with Mr Whitney's conclusion at para 7.1.3 *that while PPC13 is intended to respond to demand for residential land to help address an estimated shortfall in long term capacity such a response can be achieved by utilising other land for development*".
- 8.12 If accommodated within the areas factored to the yield assessment, would occur in a manner meeting the CMP Vision and Principles established by the Cromwell for a consolidated and contiguous urban form.

20 May 2018

ATTACHMENT 1

Curriculum vitae

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Qualifications & professional associations:

BA University of Canterbury, Dip TP University of Auckland,

Certified Hearings Commissioner – 2008 -2016

Member NZPI

Affiliate member- NZIA

Member, Resource Management Law Association.

Experience - summary profile

Marilyn Brown is an experienced RMA practitioner whose experience covers a variety of issue-oriented environmental policy and research projects, strategic planning advice, Assessment of Environmental Effects reporting, growth management studies, spatial planning and urban design evaluations. She advises as to processes and structures under the RMA, as allied both to district and regional plans and to wider resource management issues. Her work relates to urban and rural environments, key tourism environments, hydro development, petroleum exploration and infrastructure projects.

Her professional experience has been gained in local and regional and government, and in the private sector in New Zealand and California. Marilyn contributes her expertise to a wide range of issues that arise in the field of resource management, urban planning, design, and allied disciplines, and is an experienced project manager.

Marilyn is a director of NM Associates Ltd - Architects and Planners, a Wellington-based architecture, urban design and resource management practice.

Positions held

- Director, NM Associates Ltd - Architects and Planners -1995 to present
- Director, Resource Planning Peddle Thorp Ltd -1992-94
- Principal, Environmental and Planning Associates 1985-92
- Senior Regional Planner, Wellington Regional Council 1981-85
- Senior Associate, Environmental Impact Planning Corporation, San Francisco 1978-81
- Consultant, City and County of San Francisco 1978 (research project investigating the supply and demand for rental housing)
- Planner, Hutt City Council 1976 -1977
- Planner, Onehunga Borough Council 1974-75

Specific experience:

Urban planning and design, masterplans, spatial planning.

- Spatial Framework, Cromwell "Eye to the Future" Masterplan,
- Haven Precinct Development, Concept Plans and Strategic Options
- Amberley Township Urban Design Assessment
- Hanmer Springs Town Centre Masterplan & Growth Management Strategy
- Queenstown Town Centre Study
- Taupo town centre
- Bendemeer (110ha), Queenstown masterplan, documentation and PDP measures
- Threepwood (211ha) Queenstown masterplan, documentation and PDP measures
- Hanley Farm Queenstown initial concept planning
- Queenstown town centre study and urban design guidelines (1992). 3 scenarios including a, pedestrian-only town centre options, infill assessment
- Marsden Village, Wellington Streetscape upgrade
- Gibbston Valley Special Character Area zone on behalf of the Gibbston Community Assn
- Fort Dorset masterplan/development feasibility analysis
- resource consent conditions protect heritage structures, miners' cottages ruins, Gibbston Valley, processes under the Historic Places Act
- Lake Dunstan -open space management plan
- San Francisco Bay Area – on behalf of territorial agencies: concept planning for residential development within Marin County, Santa Rosa, Tiburon, environmental and fiscal impact studies for the annexation of rural land for urban development., recreation planning City of Napa.

District and regional planning, environmental management

- Submissions on South Island regional policy statements and regional plans in respect of hydro infrastructure and development for Electricorp in respect of water, land and energy resources, implications for asset management.
- evaluation of Environment Waikato's policy and plan content in respect of geothermal resources, extraction regime, management issues etc.
- Risk management and natural hazard
- comprehensive submissions for landscape protection and conservation, Wakatipu Basin - DP and PDP provisions
- analysis of site specific implications of Central Area provisions, PC48 Wellington District Plan for plot ratio and building mass
- environmental policy statement for Westech Energy NZ - key objectives for environmental management in respect of oil exploration activities

Consenting processes under the RMA and allied statutes

- advice to public and private sector clients on RMA and other consenting matters, Plan Change mechanisms, development feasibilities, heritage conservation, environmental enhancement and protection, mediations, expert evidence, project pre-assessment discussions
- author of numerous AEE's and environmental impact reports for land use and subdivision, energy exploration and development, school development, large scale commercial buildings, infrastructure corridors, issues for the redevelopment of contaminated sites.

Strategic analysis and policy research, best practice

- author of planning module of flood protocol discussion document (contributor to Centre for Advanced Engineering, University of Canterbury contract) covering interface between RMA and flood risk management, regulatory pathways and other mechanisms under RMA for implementation (advice included implementation options and techniques for integrated catchment management, sustainability indicators for risk environments), facilitation discussions on protocol development with rivers control group. 2005
- author of paper on natural hazard management under RMA and allied statutes and means by which knowledge about natural hazards may be brought into the planning process, integrated approach, effective implementation, specific case study analysis of degree of alignment in between selected regional policy/plans and equivalent district plans content (also for CAE), presenter at a workshop organised with Environment Canterbury, TA's and CAE 2003

- paper (with Graham Martin and Terry Day) to Resilient Infrastructure conference at Rotorua 'Managing New Zealand's Flood Risk'- commentary of resource management for risk management, governance roles and issues for risk management as sustainable management 2006
- for the Office of Crown Lands prepared Management Proposals for Lake Dunstan covering environmental management, Treaty obligations, obligations to ECNZ, protection of conservation values, future management model/agreed policy framework to devolve administration of lake bed and margins to CODC+ discussion document for public comment 1994
- advice to MFE (for RMLR!) relating to use of development impact levies as mechanism to promote environmental outcomes and address mitigation of environmental effects, review of NZ, Australian, Canadian and US practice,
- advice to Electricorp re issues for marginal strips legislation - access, energy development, conservation of natural resources, implications for hydro lakes and rivers.

Public participation and stakeholder input

- for many of the above projects ; facilitation of stakeholder and community involvement planning and design processes, and input to development project proposals, resource studies and inventories

Marilyn Hight Brown cv May 2019

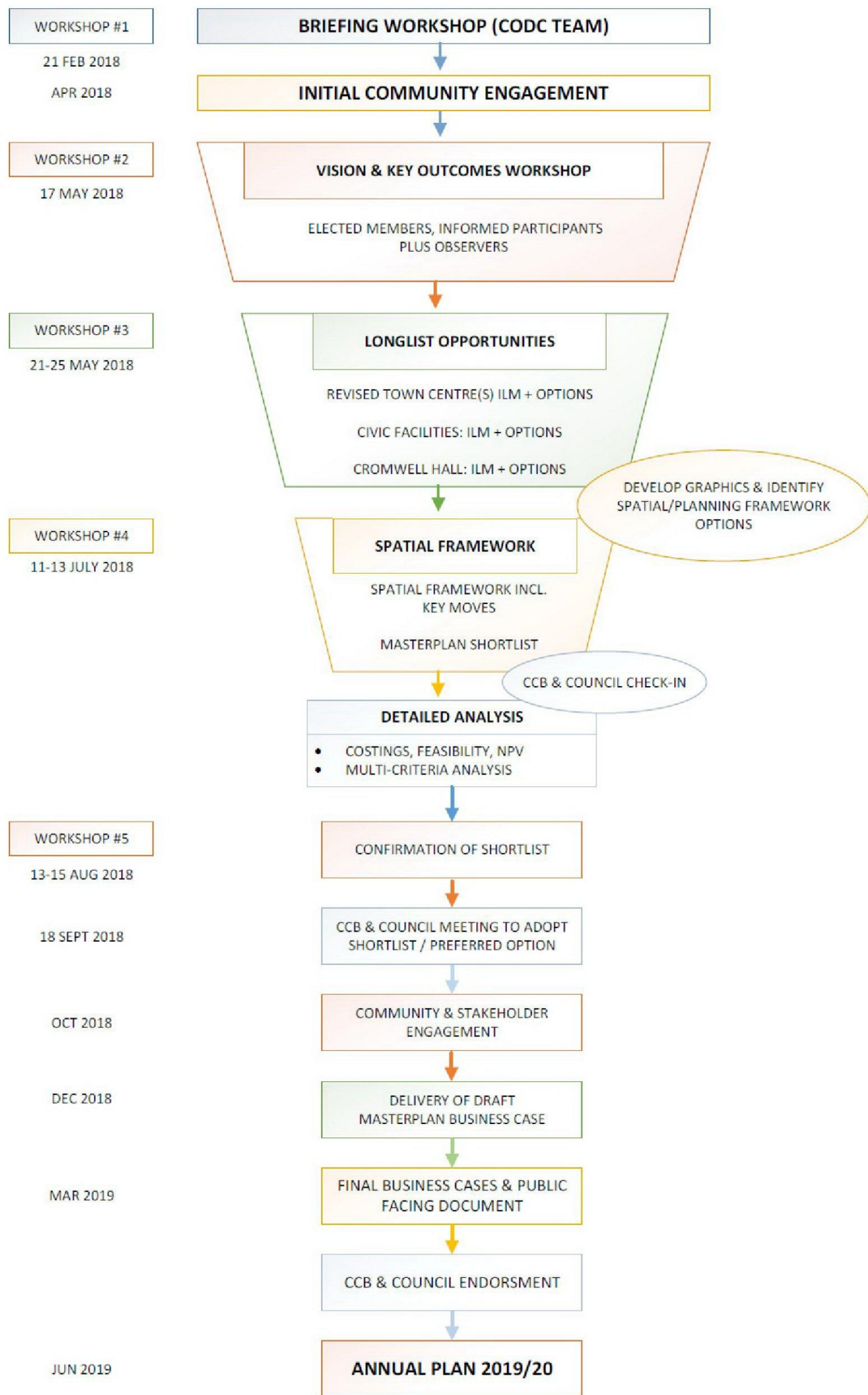


FIGURE 1: CROMWELL MASTERPLAN – WORK STAGES

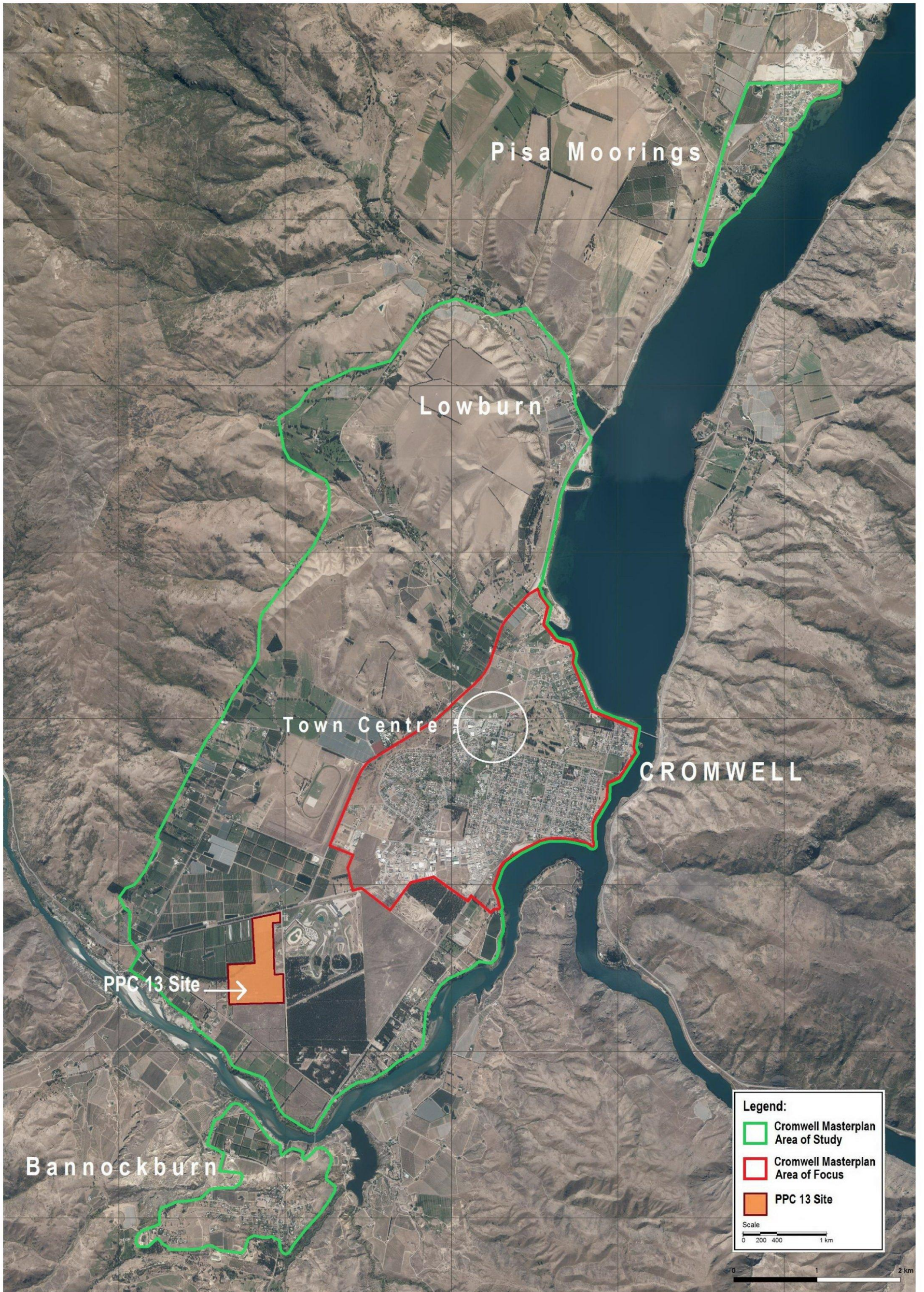


FIGURE 2: CROMWELL MASTERPLAN - GEOGRAPHICAL EXTENT

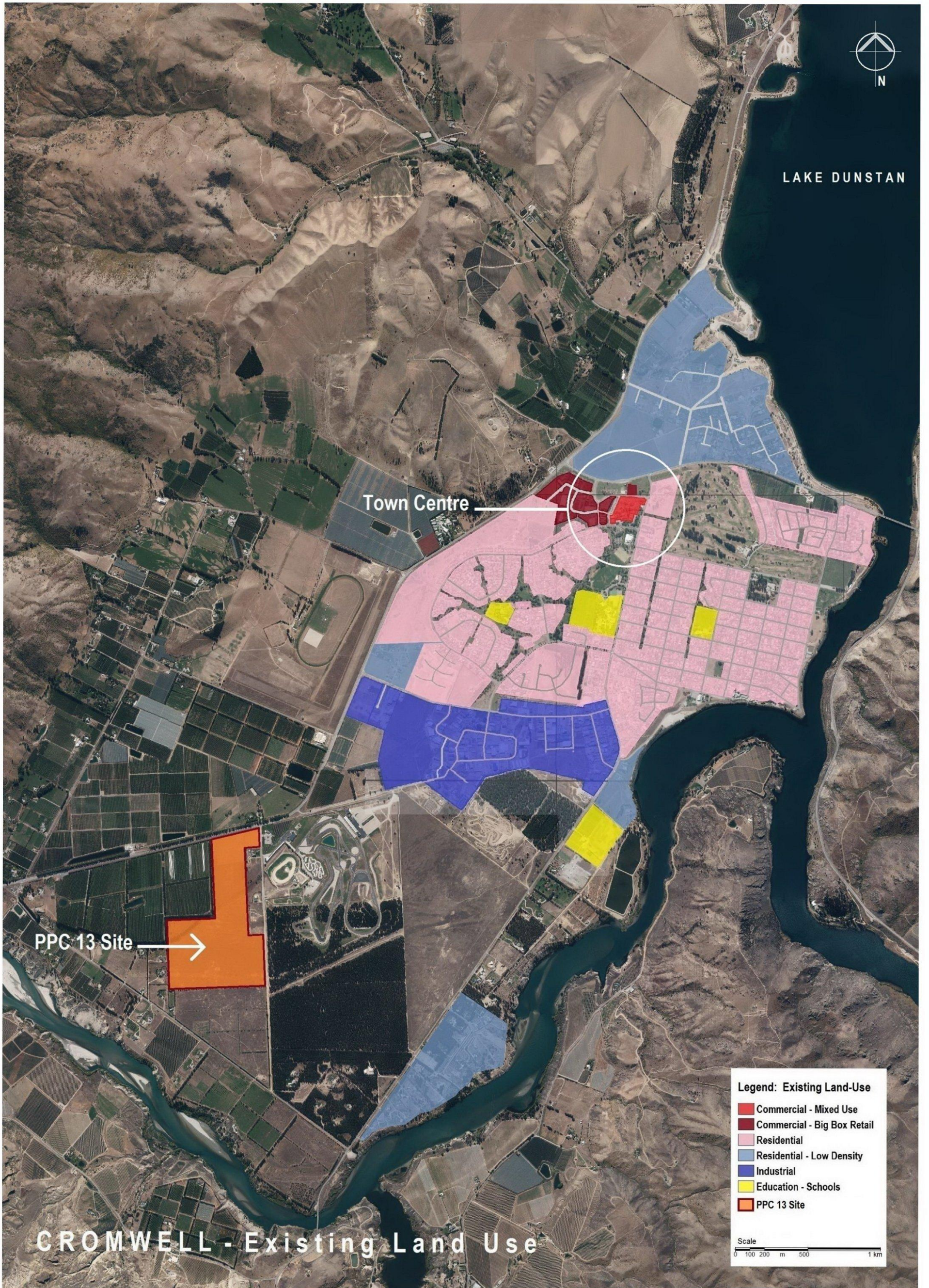


FIGURE 3: CROMWELL EXISTING LAND USE

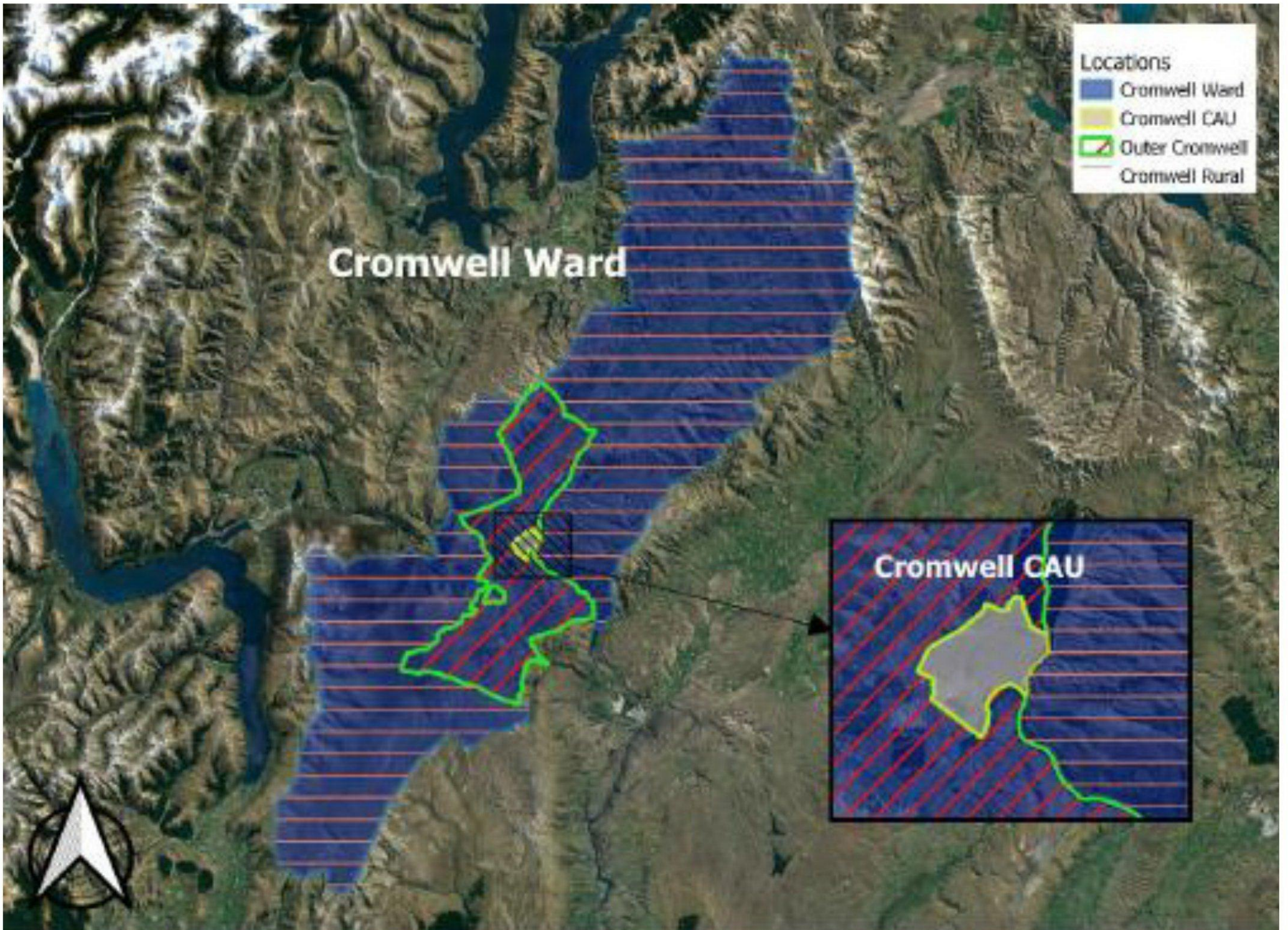


FIGURE 4: CROMWELL WARD CENSUS AREA UNITS
(source: Rationale Limited October 2018)



FIGURE 5: CROMWELL MASTERPLAN - PRINCIPLES

FIGURE 6: CROMWELL MASTERPLAN - OPTIONS

GROWTH OPTION 1. Change Focused in the Basin

This option is based on residential growth being spread across the Cromwell Basin's smaller settlements and in Cromwell's existing residential areas over the next 30 years.

Legend:
 ● SIGNIFICANT CHANGE
 ● INCREMENTAL CHANGE
 ● MINIMAL CHANGE
 ← STATE HIGHWAY OR MAIN ROAD

Key Features:

- Increased growth would be accommodated by extending the boundaries of Lowburn, Pisa Moorings, Bannockburn and Tarras.
- Land available for development in Cromwell would continue to develop as it has done in the past.
- Development would include a mix of stand-alone and multi-unit housing.
- Settlement boundaries would grow and allow for infill to accommodate more housing.
- Allowance for greenways and green spaces in any new developments.

TELL US WHAT YOU THINK OF THIS OPTION HERE:
www.codc.govt.nz/futurecromwell

GROWTH OPTION 2. Balanced Town Renewal and Growth

This option would see increased concentrations of houses and residential growth incrementally expanding to the south of Cromwell over the next 30 years.

Legend:
 ● SIGNIFICANT CHANGE
 ● INCREMENTAL CHANGE (ARROWS INDICATE DIRECTION)
 ● MINIMAL CHANGE
 ← STATE HIGHWAY OR MAIN ROAD

Key Features:

- Different housing choices to promote better use of land and increased town centre living.
- Increased District Plan protection for productive land, reducing urban sprawl into horticulture and viticulture areas.
- Smaller section sizes in Pisa Moorings, Lowburn, Bannockburn and Tarras but no extension to these settlements' boundaries.
- Increased concentration of multi-storey and mixed-use residential/commercial buildings around the Cromwell Town Centre to create a vibrant area that is well-used by residents.
- Minimum residential section sizes in Cromwell would be reduced leading to a more compact township.
- Increased focus on enhancing the greenways and open spaces.

TELL US WHAT YOU THINK OF THIS OPTION HERE:
www.codc.govt.nz/futurecromwell

GROWTH OPTION 3. Growth Focused Within Existing Cromwell

This option would enable a greater concentration of housing in Cromwell over the next 30 years.

Legend:
 ● SIGNIFICANT CHANGE
 ● INCREMENTAL CHANGE
 ● MINIMAL CHANGE
 ← STATE HIGHWAY OR MAIN ROAD

Key Features:

- No significant change to the zoning or boundaries of Pisa Moorings, Lowburn, Bannockburn and Tarras settlements.
- Productive land would be protected by District Plan rules, reducing urban sprawl into horticulture and viticulture areas.
- Encourage and enable mixed-use residential/commercial development such as terraced housing and apartment buildings in the Town Centre, parts of the Heritage Precinct and on the existing golf course land.
- Intensification of arts, cultural and complementary commercial development would occur around the Heritage Precinct.
- A concentration of housing choices would be encouraged within 800m of the Town Centre and the Heritage Precinct.
- Increased residential concentration with improved open spaces, greenways and a vibrant Town Centre.

TELL US WHAT YOU THINK OF THIS OPTION HERE:
www.codc.govt.nz/futurecromwell

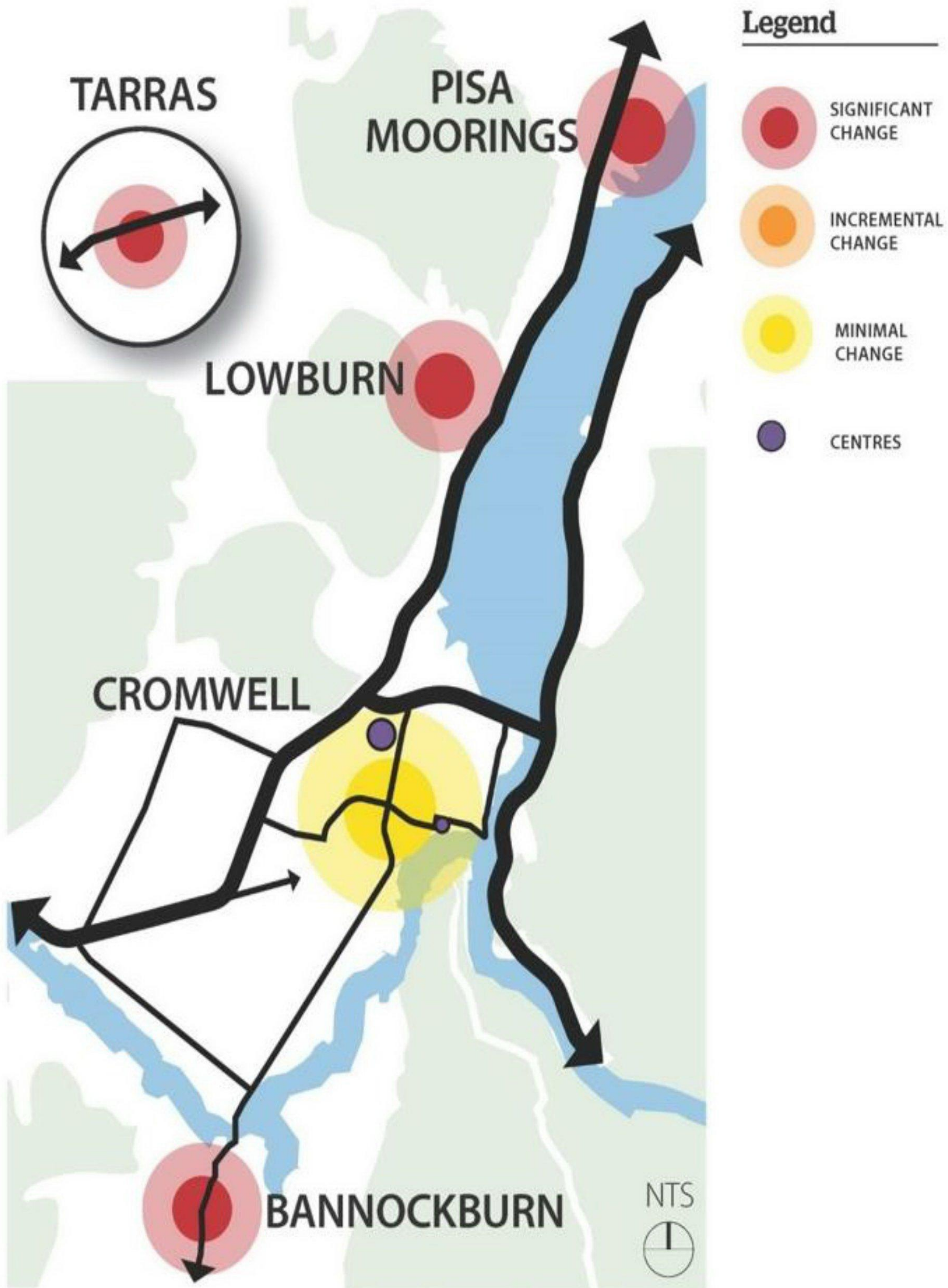


FIGURE 7.1: CROMWELL MASTERPLAN – OPTIONS COMPARISON
GROWTH OPTION 1. CHANGE FOCUSED IN THE BASIN

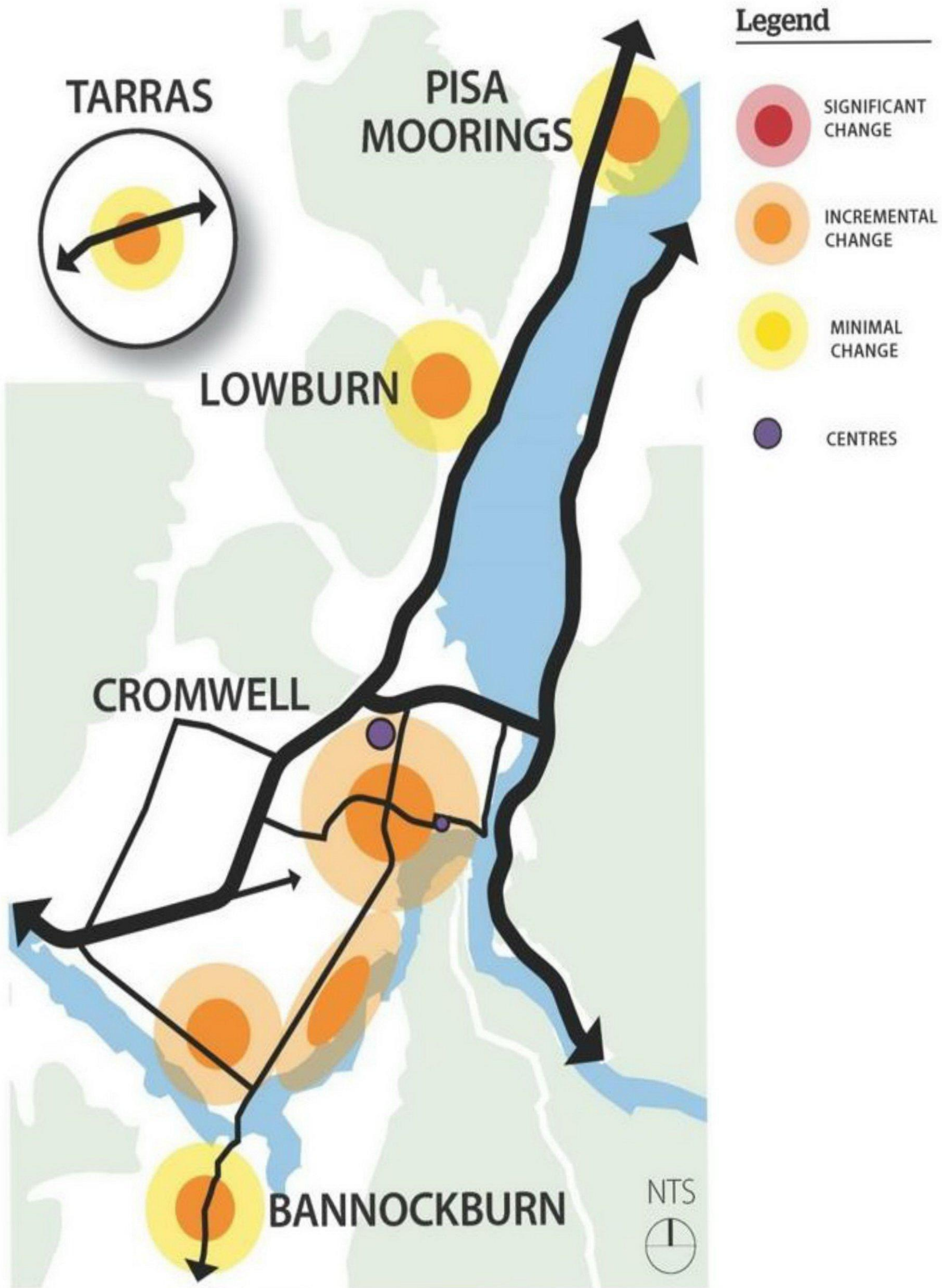


FIGURE 7.2: CROMWELL MASTERPLAN – OPTIONS COMPARISON
GROWTH OPTION 2. BALANCED TOWN RENEWAL AND GROWTH

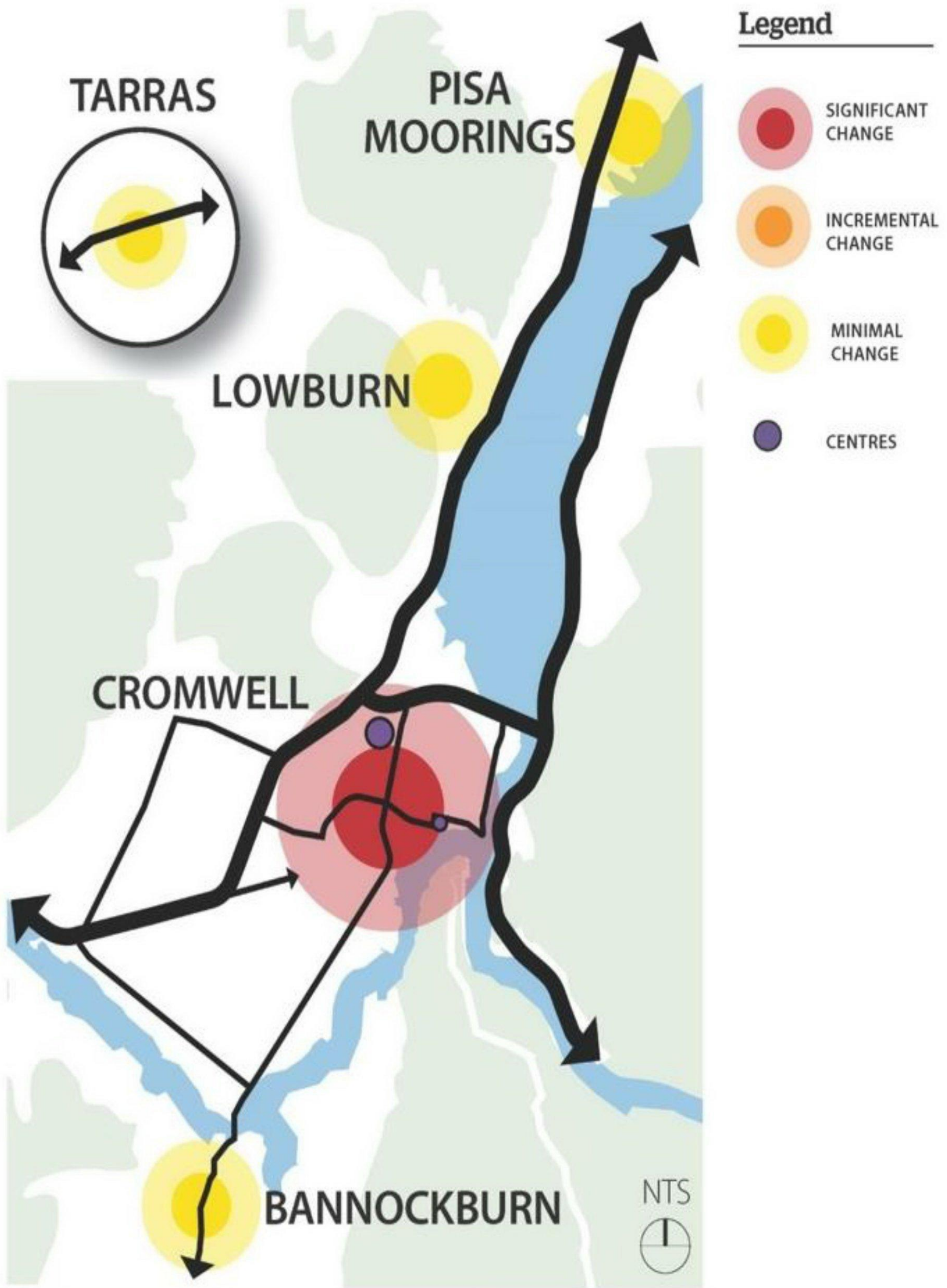
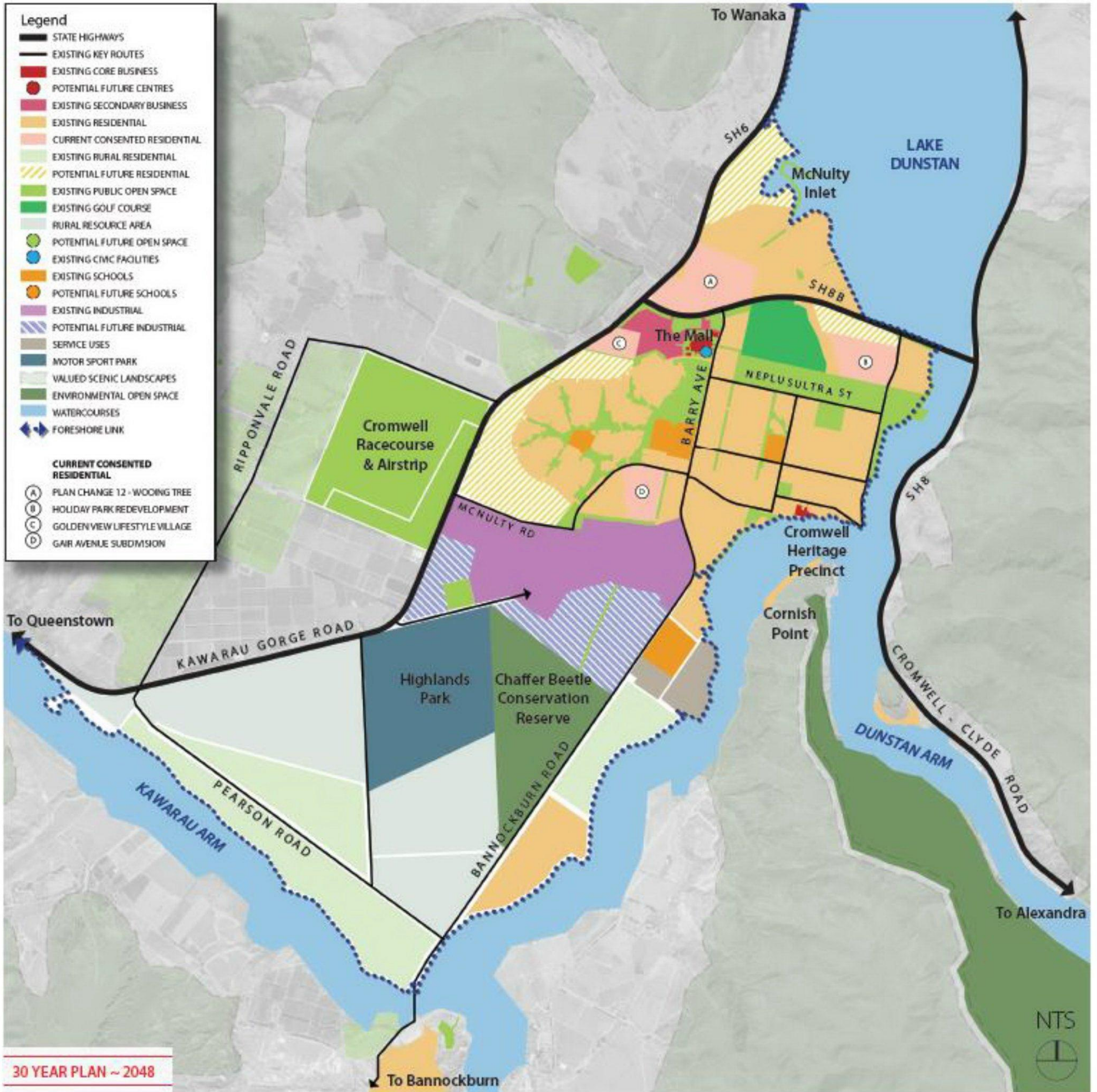
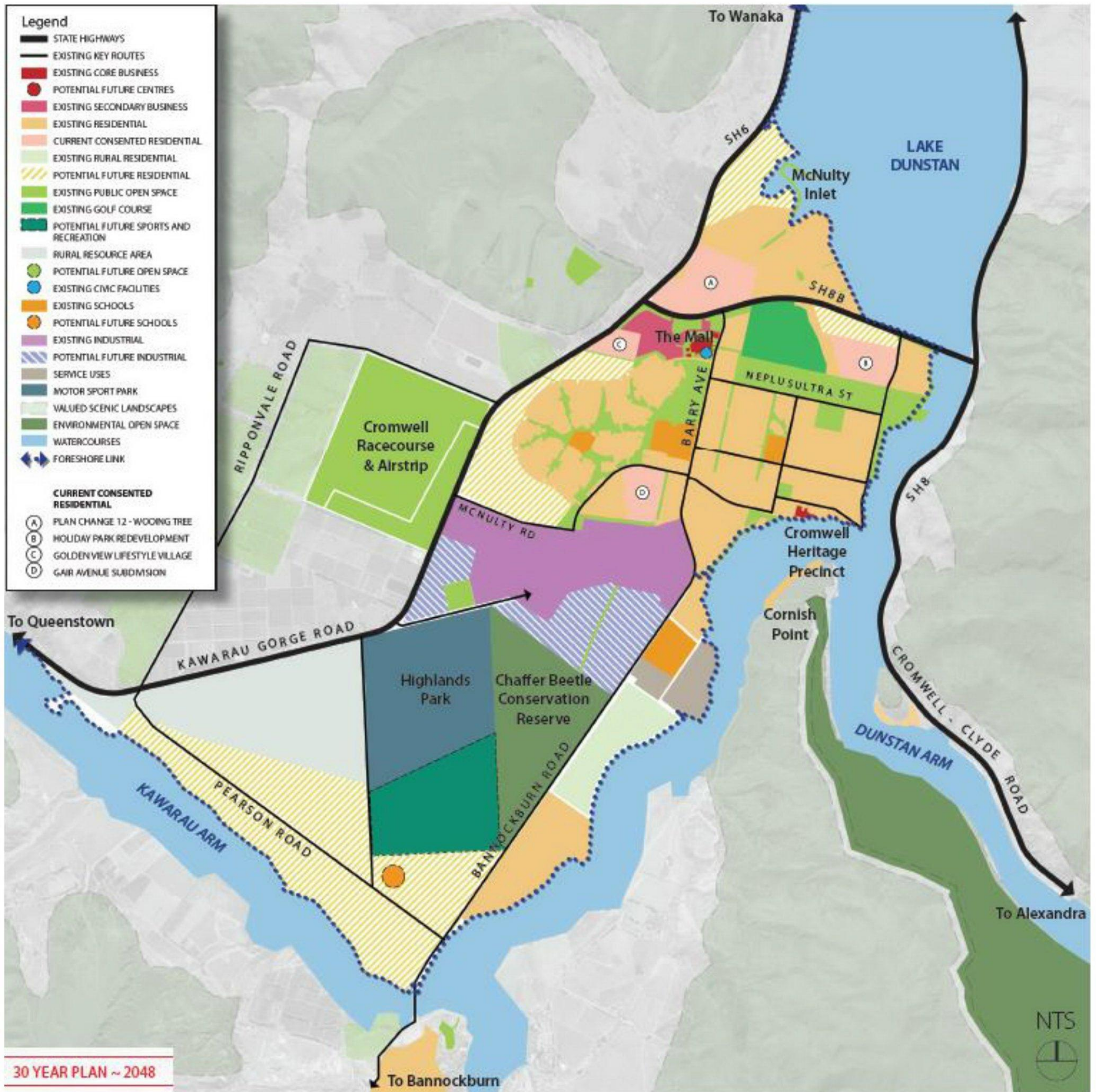


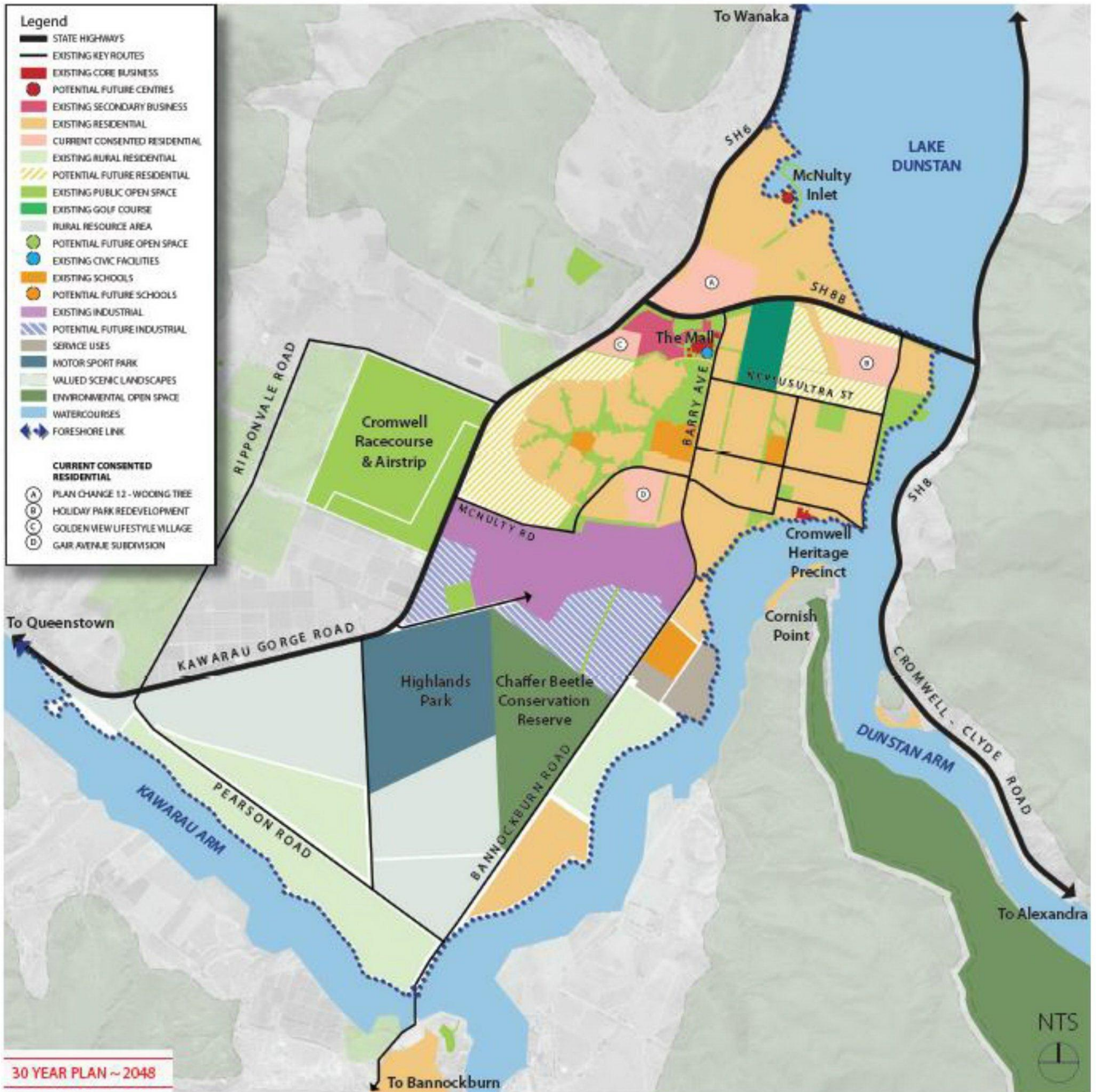
FIGURE 7.3: CROMWELL MASTERPLAN – OPTIONS COMPARISON
GROWTH OPTION 3. GROWTH FOCUSED WITHIN EXISTING CROMWELL



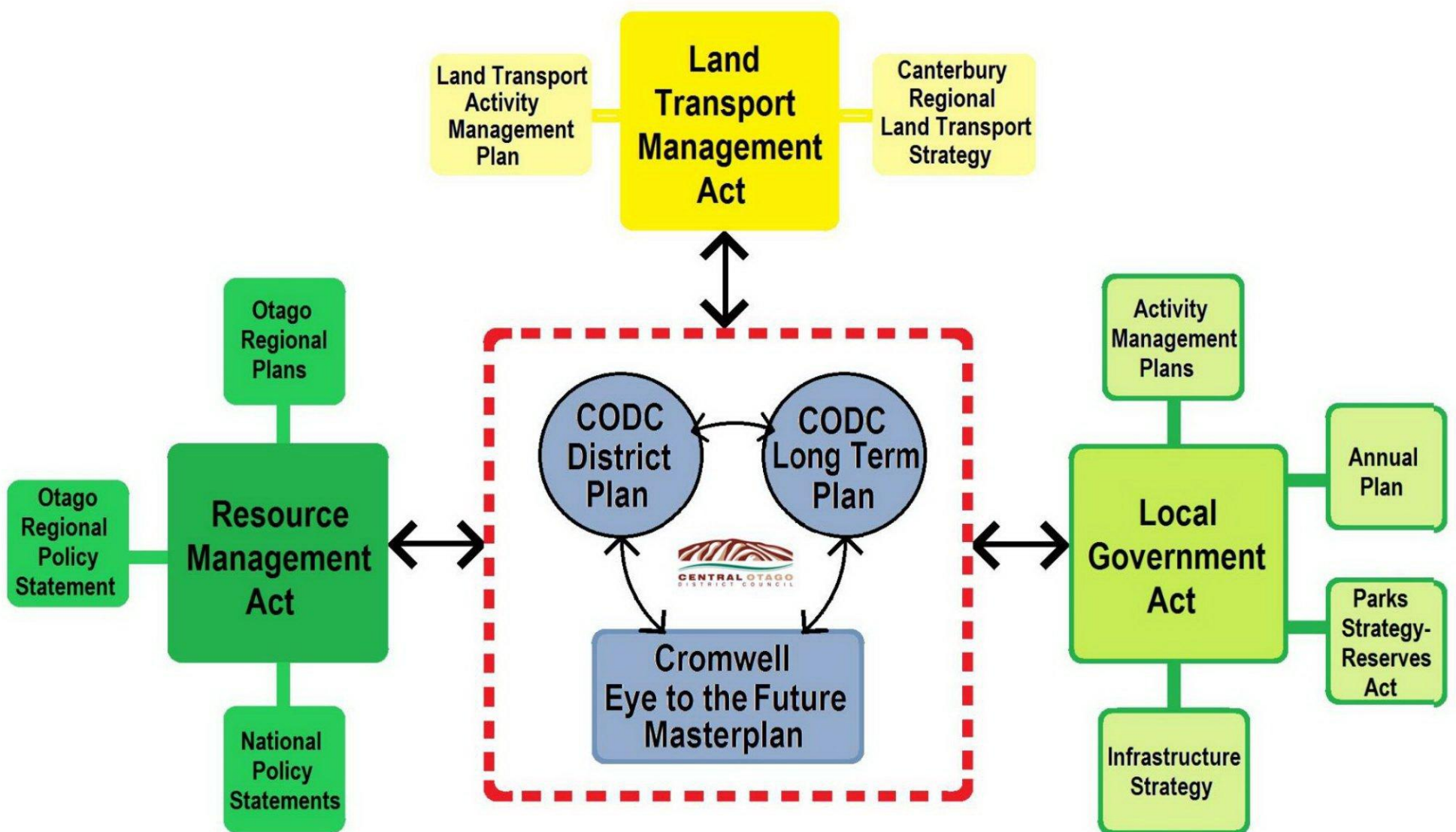
**FIGURE 8.1: CROMWELL MASTERPLAN - SPATIAL FRAMEWORK
GROWTH OPTION 1. CHANGE FOCUSED IN THE BASIN**



**FIGURE 8.2: CROMWELL MASTERPLAN - SPATIAL FRAMEWORK
GROWTH OPTION 2. BALANCED TOWN RENEWAL AND GROWTH**



**FIGURE 8.3: CROMWELL MASTERPLAN - SPATIAL FRAMEWORK
GROWTH OPTION 3. GROWTH FOCUSED WITHIN EXISTING CROMWELL**



Implementation Chart:- Cromwell 'Eye to the Future' Masterplan

FIGURE 9: CROMWELL MASTERPLAN – PROPOSED IMPLEMENTATION CHART

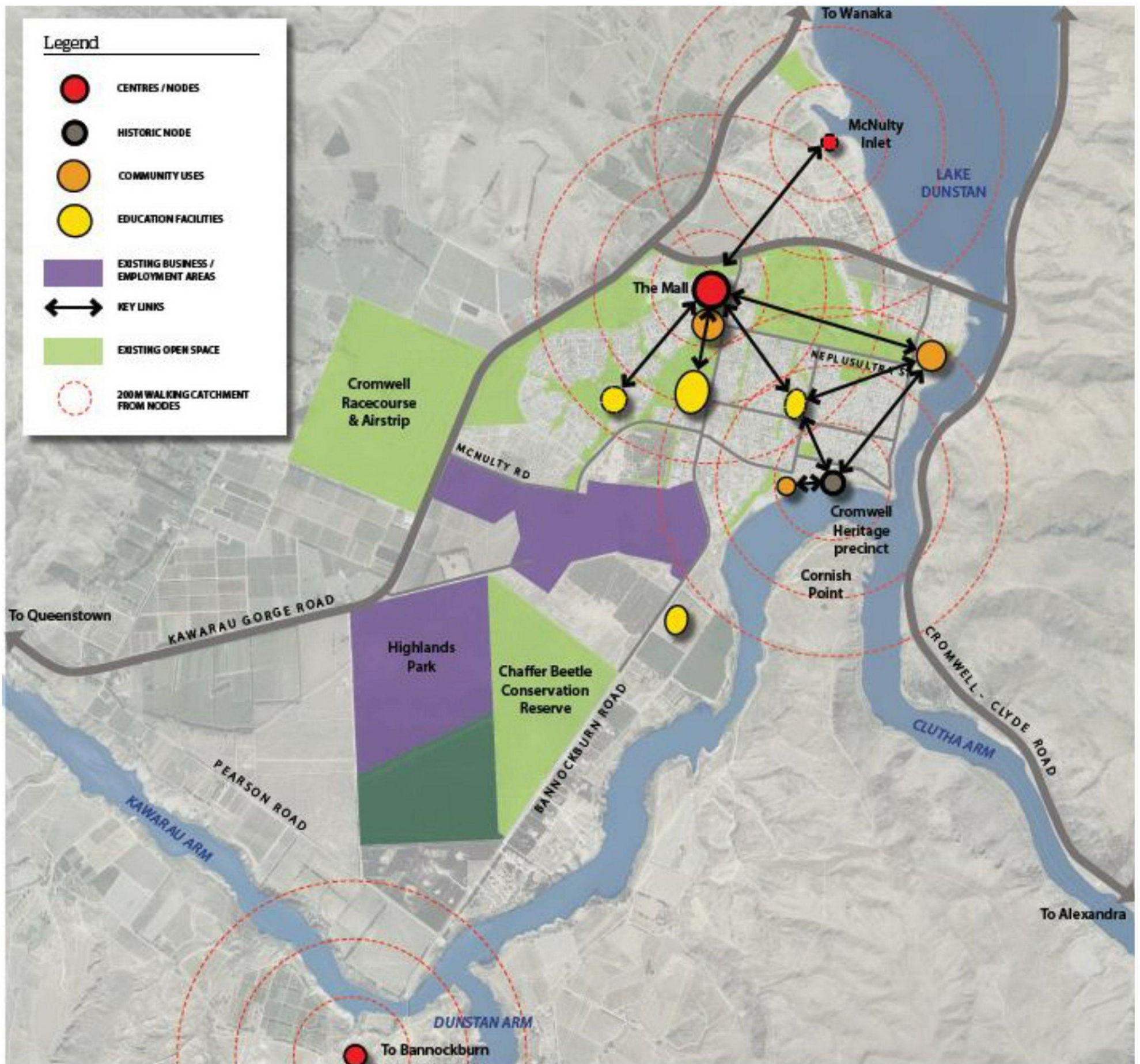


FIGURE 10: CROMWELL MASTERPLAN – CONNECTIVITY

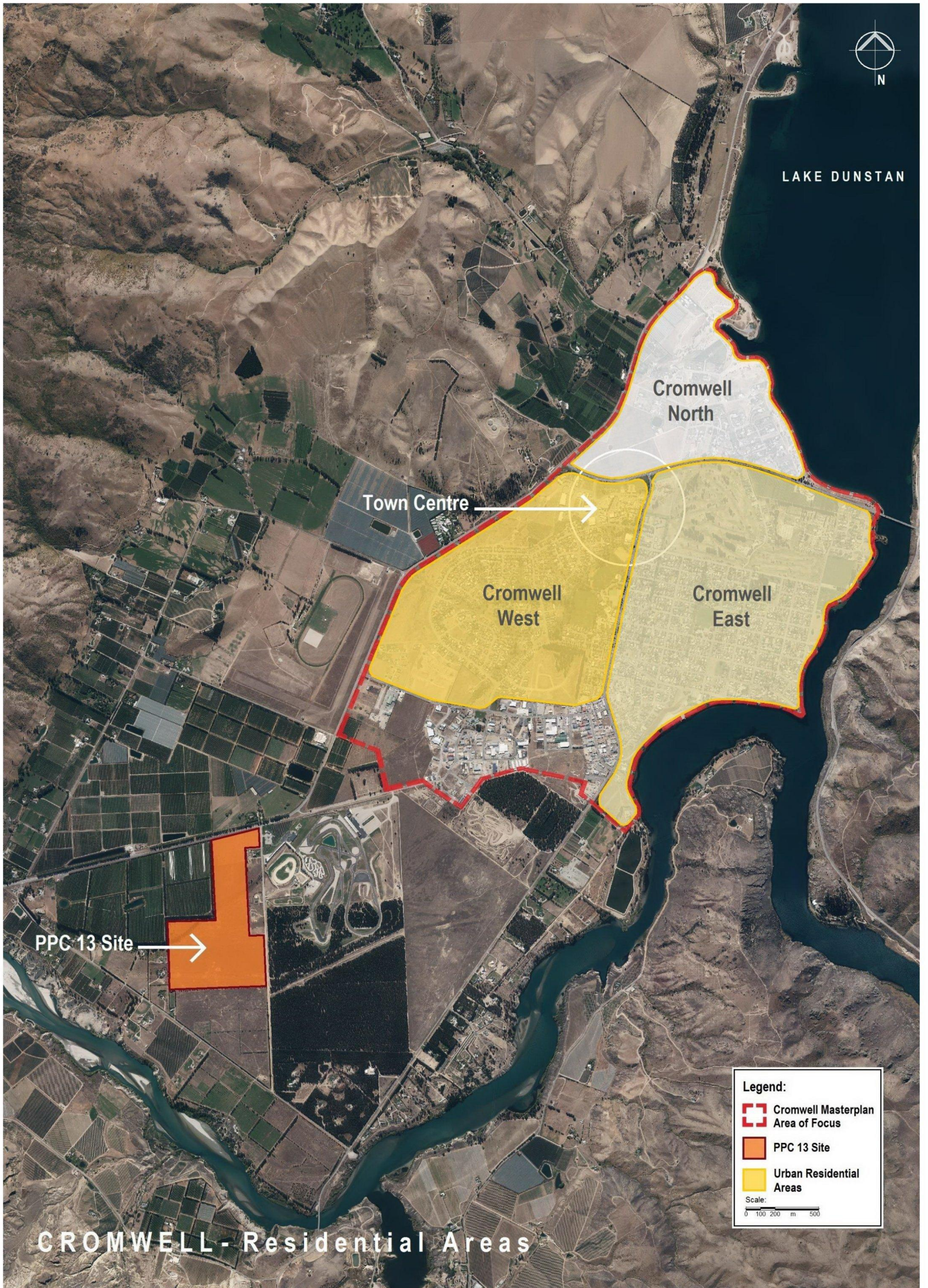


FIGURE 11: CROMWELL - URBAN RESIDENTIAL AREAS



FIGURE 12.1: CROMWELL –RESIDENTIAL INFILL EXAMPLES

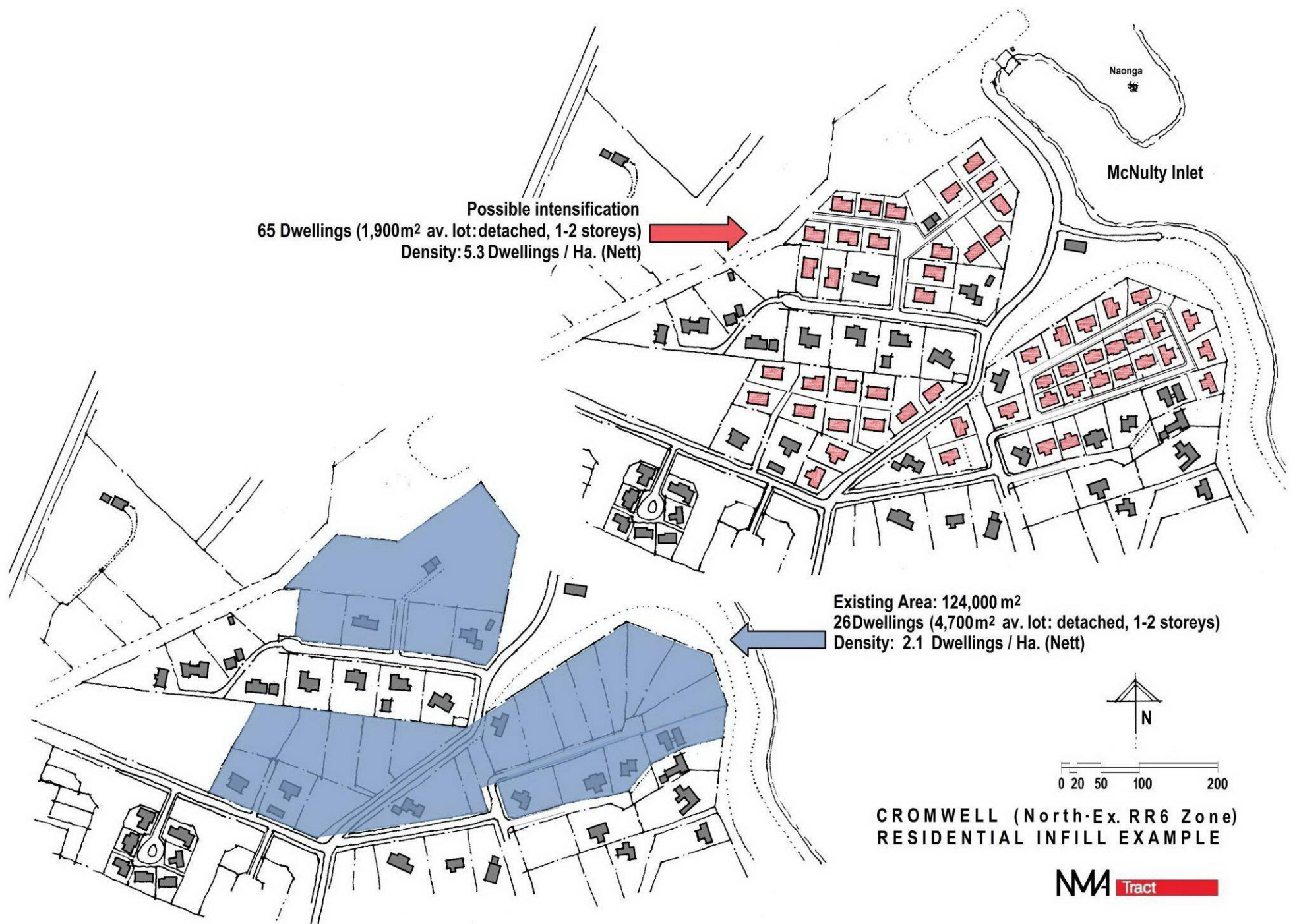


FIGURE 12.2: CROMWELL –RESIDENTIAL INFILL EXAMPLES

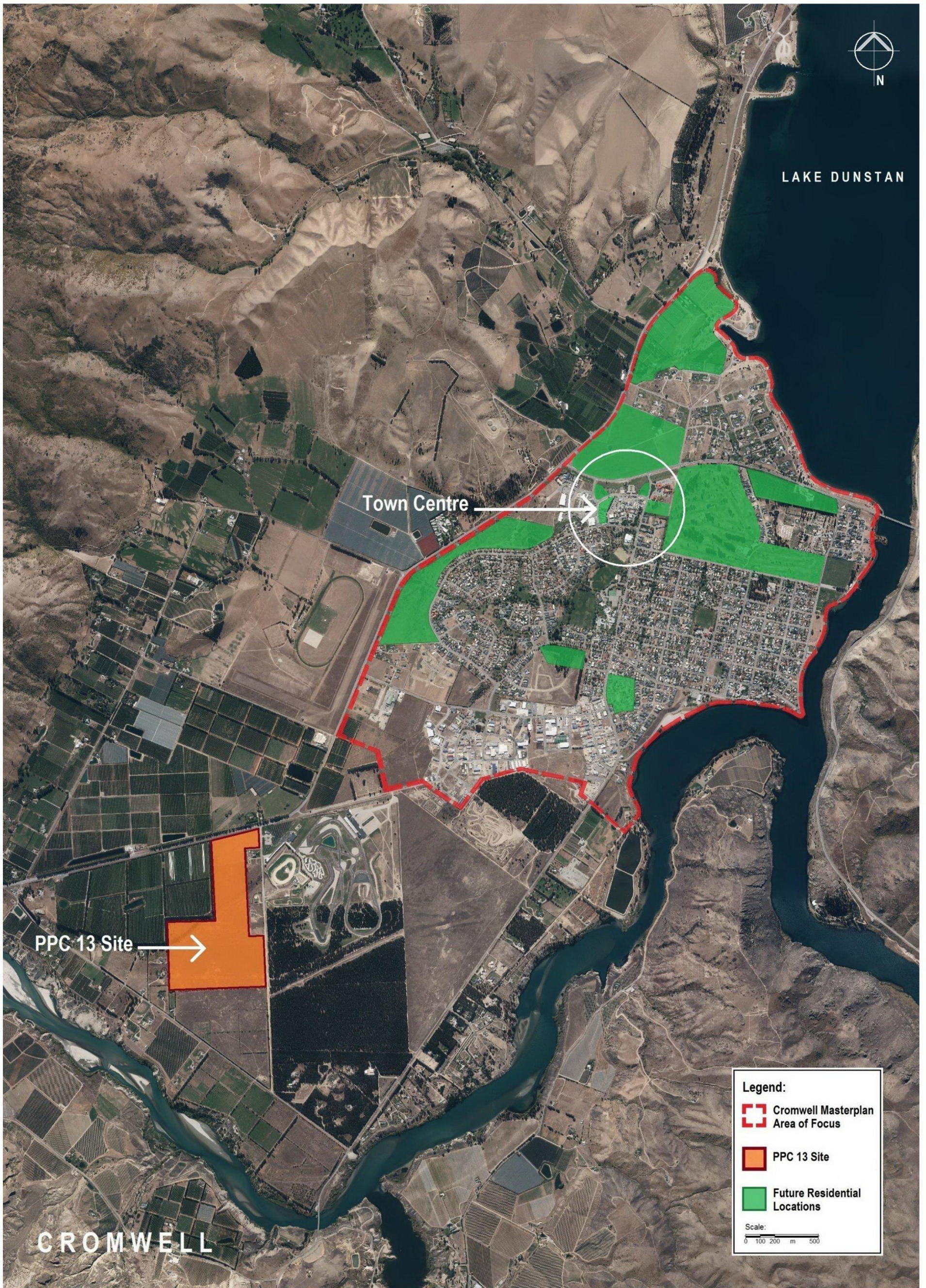


FIGURE 13: CROMWELL – POSSIBLE FUTURE GREENFIELD URBAN RESIDENTIAL AREAS