

Before the Central Otago District Council

In the matter of            The Resource Management Act 1991

And                            A requested change to the Central Otago District Council's  
Operative District Plan – Plan Change 13 (PC13)

**SECOND STATEMENT OF SUPPLEMENTARY EVIDENCE** of **Jeffrey Brown** for

**River Terrace Developments Limited**

Dated 28 June 2019

**Counsel:**

Warwick Goldsmith

Barrister

PO Box 2366, Wakatipu 9349

m + 64 021 220 8824

warwickgoldsmith@gmail.com

## Introduction and Qualifications

- 1 My full name is Jeffrey Andrew Brown.
- 2 My qualifications and experience are as detailed in my primary evidence prepared for this hearing.
- 3 I have complied with the Code of Conduct for Expert Witnesses contained in the Environment Court Consolidated Practice Note 2014. This evidence is within my area of expertise, except where I state that I am relying on another person, and I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.

## Introduction

- 4 The preparation of my Primary Evidence dated 23 April 2019, my Summary Evidence dated 11 June 2019 and my Supplementary Evidence dated 21 June 2019 was completed without reference to the “Stage 1: Spatial Plan” which is part of the “Spatial Framework” of the “Cromwell ‘Eye to the Future’ Masterplan” (the **Spatial Plan**) and which has now been introduced into the hearing.
- 5 I have reviewed the Spatial Plan and the Supplementary Evidence of Marilyn Brown dated 21 June 2019. In this Second Statement of Supplementary Evidence I discuss:
  - (a) the Spatial Plan’s relevance to this hearing, and if it is relevant, how much weight I consider should be placed on it;
  - (b) if any weight is to be placed upon the Spatial Plan, the extent to which two primary issues raised in the Spatial Plan may assist the Commission in determining the outcome of PC13;
  - (c) some aspects of Ms Brown’s Supplementary Evidence; and
  - (d) whether consideration of the Spatial Plan and related evidence has led me to change any of the opinions I have previously expressed in my evidence for this hearing.

## Spatial Plan – relevance and weighting

6 The Spatial Plan is a non-statutory document (and in particular is a non-RMA document). Councils frequently undertake non-RMA, community planning processes, such as the Cromwell Masterplan process, as a preliminary step intended to precede and inform an RMA process<sup>1</sup>. A subsequent RMA process then assesses and tests all or some of the recommendations arising from the non-statutory process, including through s32 evaluation(s), and determines whether it is appropriate to translate them into the District Plan.

7 In my view the questions of whether the Spatial Plan is relevant to this hearing, and if relevant the weight to be afforded to it, depends on:

- the extent to which the Spatial Plan can be shown to reflect the wishes of the community, through consultation;
- the extent to which the Spatial Plan has been subject to any robust examination of the alternative options available for accommodating growth; and
- the extent to which it identifies practical and available methods to achieve what it intends to achieve.

8 A notable aspect of the Spatial Plan is that it reflects one option for the future growth of Cromwell. This is apparent from a number of statements throughout the document, including, for example<sup>2</sup>:

**The Spatial Plan applies throughout the “Eye to the Future” study area and will guide the development of future zoning and District Plan changes, which will be prepared for identified growth areas in Cromwell.**

**The Spatial Plan reflects the community’s preferred option for “growth within existing Cromwell ...**

9 However, the basis on which the “... *community’s preferred option* ...” has been determined is not clear. Appendix 2 of the Spatial Plan appears to summarise “*Community Engagement Outcomes*”. It refers to a survey carried out between 19 October – 19 November 2018 which generated 477 responses. The only

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<sup>1</sup> s74(2)(b)(i) requires that in preparing or changing a Plan regard must be had to any management plans and strategies prepared under other Acts to the extent that their content has a bearing on resource management issues of the district

<sup>2</sup> Spatial Plan dated 29 May 2019, page 009, second column, last two paragraphs

statement which appears to provide a rationale for choice of the option addressed in the Spatial Plan is towards the end of Appendix 2<sup>3</sup>:

**For the Spatial Framework, 49% of the responses preferred Option 3 – Growth focused within existing Cromwell. This was mainly due to it encouraging a vibrant town centre and offering high density housing options.**

- 10 The results of that October – November 2018 survey were summarised in a document entitled “*Cromwell Masterplan – Let’s Talk Options Survey Analysis November 2018*”. I attach the relevant part of that Survey Analysis which contains the survey results relating to future growth options. My comments on those are:
- (a) The age demographic data shows a fairly heavy weighting towards older respondents, the majority of whom probably own their own homes (although that is not clear). Representation of younger age groups in the survey results is low, and it is not possible to tell how many of the respondents were people wanting to acquire a home rather than people who already own their own home;
  - (b) It is correct that 49% of respondents favoured preferred Option 3, but it follows that 51% of respondents did not favour that option;
  - (c) The stated primary reasons in the quotation in paragraph 9 above for the choice of Option 3 were also the two primary reasons for the 30% of respondents who chose Option 2 (being the ‘balanced growth option’ which includes densification of the town centre plus greenfield development south of the town);
  - (d) The recorded comments from some of the 51% of respondents who did not favour Option 3 include a number of comments about retention and protection of green spaces and recreation areas, with a number of specific references to protection of the Cromwell Golf Course.
- 11 The Spatial Plan does not contain any analysis of why the non-preferred Options 1 and 2 were discarded and the preferred Option 3 was chosen, other than the statement quoted in paragraph 9 above.
- 12 That lack of analysis leads directly to the issue of s32-type considerations. There is no analysis of alternative options at all, and in particular there is no analysis of the benefits and costs of the different potential options.

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<sup>3</sup> *ibid*, page 069, right hand column, third last paragraph.



- 13 This is highlighted by the detailed Submission dated 13 November 2018 lodged by RTDL in response to that October – November 2018 survey. Mr Bretherton has confirmed in evidence<sup>4</sup> that RTDL's submission to that survey was virtually identical to the Memorandum of Alastair Ray (and accompanying analysis by Natalie Hampson) dated 30 November 2018, which was lodged with the Commission in response to the Commission's Minute 1 dated 7 November 2018. That submission effectively summarised the PC13 proposal.
- 14 In my view PC13 achieves the two outcomes referred to in the statement I quoted in paragraph 9 above (i.e. a vibrant town centre and high density housing options) and does not put pressure on the Cromwell Golf Course which a number of survey respondents sought to protect. The publicly notified PC13 initiative was an option which at least deserved some consideration in the analysis which resulted in the Spatial Plan. However, the Survey Analysis contains no reference to RTDL's Submission and does not consider the PC13 option, or other "southern land" options, and does not properly assess them in comprehensive, comparative manner against the other options.
- 15 I therefore consider that very little, if any, weight should be placed on the Spatial Plan as demonstrating an appropriate future option for the growth of Cromwell because of the lack of any robust assessment of the options.
- 16 A second reason for placing little or no weight on the Spatial Plan arises from the fact that it contains no reference to, or any broad assessment against, other key RMA matters including the District Plan and the Regional Policy Statement. In my view it is inappropriate to essentially determine the preferred option for the future growth of Cromwell without any assessment against the essential statutory factors.
- 17 There are some brief comments in Ms Brown's Supplementary Evidence that relate to the RMA<sup>5</sup> – namely that the CMP's vision, aspirations and principles link to Part 2 and s31 of the Act, but there is no detailed assessment against these statutory provisions and no examination that would inform whether or not other options, such as the CMP's Option 2, could similarly link to Part 2 and s31.
- 18 To the extent that the Spatial Plan does address part of the relevant statutory framework, specifically the National Policy Statement – Urban Development Capacity (**NPS-UDC**), the Spatial Plan does not address it correctly, in my view.

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<sup>4</sup> During Mr Bretherton's presentation at the hearing, 11 June

<sup>5</sup> Supplementary Evidence of Marilyn Brown dated 21 June, paragraph 23

- 19 In my Primary and Summary evidence, and in the Planners' JWS, I relied on Ms Hampson's view about the relevance of the NPS-UDC. Ms Brown's Supplementary Evidence does not address this issue, but the following statements in the Spatial Plan are relevant:

**The Cromwell 'Eye to the Future' Masterplan provides a clear framework for the future growth of Cromwell from a town of around 5,000 to approximately 12,000 ...<sup>6</sup>**

**A Spatial Plan should also consider the extent of land potentially necessary to accommodate future residential and business growth. This is a mandatory matter for territorial authorities where there is an urban environment of 10,000 or more persons; refer the [NPS-UDC].**

**Cromwell's population is not currently at the level where the NPS UDC would apply, however may be so within the "Eye to the Future" planning period.<sup>7</sup>**

**A policy directive under the Resource Management Act in accommodating growth is that of the [NPS-UDC]. In order to give effect to the NPS-UDC there must be sufficient, appropriately zoned land for housing ...<sup>8</sup>**

**The NPSUDC does not currently apply to the Cromwell township and will not do so until Cromwell's urban environment, as defined in the NPS, reaches 10,000 or more people.<sup>9</sup>**

- 20 Two of the references (the third and fifth) quoted above appear to assume that Cromwell will not be subject to the NPS-UDC until and unless it reaches the trigger population of 10,000 people. I understand that interpretation to be incorrect. Under the NPS-UDC, "urban environment" is defined as:

**Urban Environment means an area of land containing, or intended to contain, a concentrated settlement of 10,000 people or more ... [my underlining]**

- 21 Assessing the population enabled by the current zonings as the basis for assessing the intended population of Cromwell is a logical approach, and I rely on the analysis of Ms Hampson that such an approach results in Cromwell qualifying as an *urban environment* for the purposes of the NPS-UDC<sup>10</sup>.

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<sup>6</sup> Spatial Plan dated 29 May 2019, page 009, left hand column, first paragraph

<sup>7</sup> *ibid*, page 010, first column, last paragraph and second column, first paragraph

<sup>8</sup> *ibid*, page 028, second column, last paragraph

<sup>9</sup> *ibid*, page 028, third column, last paragraph

<sup>10</sup> Summary evidence of Natalie Hampson dated 10 June 2019, paragraphs 37 - 44

- 22 If the Spatial Plan is relevant to this hearing, it might be arguable that the Spatial Plan, which I understand been adopted by the Cromwell Community Board under delegated authority from the Council<sup>11</sup>, represents the Council's intention for the future population of Cromwell. In that case the first statement from the Spatial Plan that I quoted in paragraph 19 above appears to support Ms Hampson's interpretation and assessment.
- 23 I therefore consider that the NPS-UDC is an important aspect of consideration of PC13.

### **Spatial Plan – two key issues**

- 24 If the Spatial Plan is considered relevant to this hearing, below I consider two of the key issues raised in the Spatial Plan, relevant to PC13, to assess whether the Spatial Plan assists the Commission in determining PC13. These are:
- Affordability of housing;
  - Availability of housing.
- 25 I acknowledge that there are other key issues, including rural land and productivity, reverse sensitivity, and urban integration and connectivity. I have addressed these at length, and in reliance on other witnesses, in my Primary Evidence and Summary Evidence, and I do not revisit them here.

### ***Affordability***

- 26 Appendix 3 of the Spatial Plan contains "Investment Logic Maps" which I understand were the first steps in the CMP process. The first two of these maps<sup>12</sup> contain the following three "Problem" statements:

**Resistance to change, driven by a desire to keep Cromwell as it is & uncertainty about its future, reduces housing options & affordability, distorting the community fabric.**

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<sup>11</sup> Supplementary Evidence of Marilyn Brown dated 21 June 2019, at paragraph 6 on page 1 and as advised in verbal submissions by Ms Caunter

<sup>12</sup> Spatial Plan dated 29 May 2019, page 070

**Land banking & a lack of appropriately zoned land, limits the town's ability to accommodate growth, reducing affordability and placing pressure on productive land.**

**Resistance to change and constrained rules for housing, limits housing choices to meet the diverse needs of families, workers & others wishing to live, work and play in Cromwell.**

- 27 The above Problem statements are then linked to the following Benefit statement:

**Housing is affordable and available to meet demand and meet the needs of a productive and strong community.**

- 28 Appendix 1 of the Spatial Plan contains the "Consultant Brief" for preparation of the Cromwell Masterplan, including the Spatial Plan. That Brief includes the following statement<sup>13</sup>:

**The masterplan will consider the town and its many functions, while recognising and demonstrating how the issues associated with prolonged growth can be responded to ...**

- 29 Appendix 1 then details a number of required Masterplan outcomes. One outcome required to be achieved is<sup>14</sup>:

**Provide a focus on providing a range of residential choice, to address affordability and introducing the incentives/levers for greater density of living close to town centre nodes.**

- 30 The Executive Summary at the beginning of the Spatial Plan<sup>15</sup> lists five "Aspirations" to be achieved by the Masterplan. The fourth Aspiration is:

- **Housing is affordable and available.**

- 31 I conclude from the above that the Masterplan process is intended to demonstrate how affordable housing can and will be achieved. That leads to the question of whether the Spatial Plan achieves that intention.

- 32 The Spatial Plan records in its Introduction<sup>16</sup> that Cromwell is experiencing economic and environmental change influenced by a number of factors, including:

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<sup>13</sup> ibid, page 067, left hand column, third paragraph

<sup>14</sup> ibid, page 067, right hand column, fifth bullet point

<sup>15</sup> ibid, page 008, left hand column, fourth bullet point

<sup>16</sup> ibid, page 009, left hand column, second bullet point

**National and regional factors (eg: changes in household sizes and affordability, altered demographics with a larger seniors age group ...**

33 The section of the Spatial Plan which addresses ‘Strategic Directions’ records two of the Problem statements that I quoted in paragraph 26 above<sup>17</sup>.

34 “Key Principle 03” of the Spatial Plan refers to<sup>18</sup> *“Foster increased diversity in housing choices”* which could imply a reference to sale price levels which achieve affordable housing.

35 Strategic Objective 5 of the Spatial Plan includes<sup>19</sup>:

- **Address current and future housing needs for all sectors of the community.**
- **Provide sufficient residential capacity to meet demand and housing choice as it arises including visitor and seasonal worker accommodation.**
- **Provide a wider range of housing types and sizes (‘typologies’) in order to ensure a greater choice of accommodation and liveability for all segments of the Cromwell community.**

36 Objective 5 goes on to state<sup>20</sup>:

**The evaluation of residential development proposals should therefore include consideration of availability, affordability and convenience ...**

37 Part 3.3 of the Spatial Plan sets out the “Key Moves”, and Key Move 3.3.5, relating to accommodation of new residential growth, states<sup>21</sup>:

**An appropriate mix of dwelling size, type and affordability to meet the changing composition of housing needs and lifestyles.**

38 Part 4 of the Spatial Plan contains Implementation recommendations. The only recommendation relevant to this issue can be found in the set of

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<sup>17</sup> *ibid*, page 019

<sup>18</sup> *ibid*, page 020

<sup>19</sup> *ibid*, page 024, middle column

<sup>20</sup> *ibid*, second paragraph

<sup>21</sup> *ibid*, page 043, left hand column, first bullet point

Recommendations relating to altering the District Plan which includes the following<sup>22</sup>:

**Further consider measures to:**

- **Mechanisms for affordable housing.**

39 In her Supplementary Evidence Ms Brown:

(a) records part of the focus of the Spatial Plan as:

**... providing a focus in enabling a range of residential choice to address housing affordability and preference, an increased density of development and a range of dwelling typologies amongst the currently predominant single-family housing stock.**<sup>23</sup>

(b) states that:

**The Spatial Plan, does not, at this stage, include some of the more detailed mechanisms to implement the Cromwell Masterplan. Examples of intended work streams include further analysis of housing affordability and preference factors, and the commencement of detailed evaluations for District Plan Review and/or Council-initiated Plan Changes.**<sup>24</sup>

(c) records the Aspiration quoted above:

**... housing is affordable, available to meet demand, and meets the needs of a productive and strong community.**<sup>25</sup>

40 My conclusions about the affordability aspect of the Spatial Plan, based upon the extracts quoted above and in relation to Ms Brown's evidence, is that the Spatial Plan:

- (a) recognises the significant challenge currently facing Cromwell in relation to the affordability of housing;
- (b) appears to anticipate achieving housing affordability through the method of providing for a range of housing typologies, without explaining how that method will achieve affordable housing;

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<sup>22</sup> *ibid*, page 061, eighth bullet point

<sup>23</sup> Supplementary Evidence of Marilyn Brown dated 21 June 2019, at paragraph 8(c) on page 1

<sup>24</sup> *ibid*, at paragraph 10 on page 2

<sup>25</sup> *ibid*, at paragraph 21(c) on page 3

- (c) recommends further consideration of “*mechanisms for affordable housing*” without identifying any such mechanisms or assessing the possibility of developing such mechanisms;
- (d) has not yet addressed the critical issue of affordability as one of the issues which must be considered and resolved in order to address Cromwell’s housing challenges.

41 In reaching the conclusions above I am not necessarily criticising the Spatial Plan. Introduction 1.2.2 of the Spatial Plan<sup>26</sup> states that a “Spatial Framework: Spatial Plan”:

**illustrates an intended location, form and mix of residential, rural and business areas along with the critical transport and infrastructure required to service those areas together with any relevant environmental attributes and constraints.**

42 The key components of a Spatial Framework: Spatial Plan are then stated to include<sup>27</sup>:

- **The types of development that should take place.**
- **The extent and density of development advised.**
- **A visual illustration of the intended future ...**

43 It is clear therefore that the Spatial Plan intends to direct location and form of growth, but I am unsure if it was actually intended to directly address affordability or not, and I note that the Implementation section recommends that the issue of affordability be subject to a future work stream. Whatever the reason, it is clear that the Spatial Plan does not address the issue of affordability.

44 In his primary evidence Chris Meehan addressed development cost and affordability issues relating to multi-unit housing<sup>28</sup>. He has also committed to selling the first 200 lots and 200 house/land packages at specified price levels in Stage One of the development (as addressed in the updated PC13 provisions filed on 21 June 2019, at Rule 20.7.7(xii)) which cannot be achieved if delivering multi-unit residential development within the central Cromwell residential areas.

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<sup>26</sup> Spatial Plan dated 29 May 2019, page 010, left hand column

<sup>27</sup> *ibid*

<sup>28</sup> Primary Evidence of Chris Meehan dated 23 April 2019, at paragraphs 30-38 on pages 7 – 8

- 45 His evidence has particular relevance in considering the following statement from the Spatial Plan Strategic Objective 5 relating to residential development<sup>29</sup>:

**Projected population and household growth within the planning period is discussed in more detail on the following pages. However, as intimated the ‘CMP 2050’ strategy for urban consolidation will require an increased density of residential development including for altered typologies that are attached and semi-detached dwellings and mixed use commercial residential development in the town centre ...**

- 46 Mr Meehan has significant experience in greenfields, urban residential development. I rely on his evidence that he can and will deliver the committed residential lots and houses within the specified price ranges, and that there is no prospect of anybody else achieving that.

### ***Availability***

- 47 The second key component identified as an Aspiration for the Spatial Plan is that housing “... *is available*”. Availability of housing is in turn dependent on two matters:

- (a) That sufficient land is appropriately zoned for residential development;
- (b) That zoned land is developed and brought to market.

- 48 In relation to sufficient zoned capacity, I have relied on Ms Hampson’s evidence on the existing and future potential zoned capacity, which was based on Ms Brown’s 7 June memorandum, which in turn was based on the Spatial Plan. I therefore have no reason to change my previously expressed opinions in my Primary, Summary and Supplementary Evidence <sup>30</sup>, and in reliance upon Ms Hampson’s evidence.

- 49 On one specific point, the Spatial Plan includes provision of 510-680 residential units on the existing Cromwell Golf Course<sup>31</sup>, and Ms Brown refers to this in her Supplementary Evidence<sup>32</sup>. Half of the golf course is owned by the Cromwell Golf Club. The other half is Recreation Reserve under the Reserves Act 1977 and is

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<sup>29</sup> *ibid*, page 024, middle column, last paragraph

<sup>30</sup> My Primary Evidence dated 23 April 2019, Part 8; Summary Evidence dated 11 June 2019, paragraph 46; Supplementary Evidence dated 21 June 2019, from paragraph 18

<sup>31</sup> Spatial Plan dated 29 May 2019, page 029, Estimated Residential Yields Table

<sup>32</sup> Supplementary Evidence of Marilyn Brown dated 21 June 2019, at paragraph 29 on page 4



leased to the Golf Club. I am not aware that the Golf Club has agreed to this outcome.

- 50 Of particular relevance to this point is the statement in Appendix 1 Consultant Brief (for the Masterplan) that the Masterplan process would<sup>33</sup>:

**Involve investors, partners, stakeholders and the community at key points to test the options and champion the preferred way forward.**

- 51 The residential development of the golf course contributes significantly to the Estimated Residential Yields Table of the Spatial Plan<sup>34</sup>, but there is no evidence that redevelopment of the golf course is a likely outcome. As I discussed in my Supplementary Evidence<sup>35</sup>, use of that land would require several processes of which the outcomes cannot be predicted with any degree of certainty. If they do happen, it would likely not be in the short or medium term.

- 52 On the issue of land being developed and brought to the market, Part 2.4 Growth Projections of the Spatial Plan includes the following statement<sup>36</sup>:

**The Cromwell Housing and Business Capacity Assessment indicates sufficient capacity to meet the demand for housing out to 2048, including as provided within the town centre and nearby locations.**

- 53 By way of comparison I refer to the Housing Development Capacity Assessment (HDCA) 2017 prepared for the purposes of the Queenstown Lakes District's current District Plan Review. The following statement is taken from that HDCA<sup>37</sup>:

**The demand and capacity assessment in this HDCA shows a consistent pattern where QLD total housing capacity is well in excess of demand, for both urban QLD and the total District in the short, medium and long-term. This includes allowance for the margins required by the NPSUDC and assessment under a medium and high growth outlook (which spans Council's Recommended growth projection), at a high-level, this satisfies Policy A1 of the NPSUDC.**

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<sup>33</sup> Spatial Plan dated 29 May 2019, page 066, right hand column, second last bullet point

<sup>34</sup> *ibid*, page 029

<sup>35</sup> My Supplementary Evidence dated 21 June 2019, paragraph 24

<sup>36</sup> *ibid*, page 028, right hand column, first paragraph

<sup>37</sup> Queenstown Lakes District Housing Development Capacity Assessment 2017, at page 39, third paragraph

- 54 Despite having more than 30 years' of zoned and feasible residential capacity available, Queenstown is facing its own housing crisis with increasing demand and limited supply<sup>38</sup>.
- 55 Paragraphs 26 to 46 above, addressing affordability, all apply equally to availability of residential product on the market. I will not repeat that analysis which applies in exactly the same way. My conclusions in paragraph 40 above also apply in exactly the same way to availability. The Spatial Plan, and the Supplementary Evidence of Ms Brown, do not explain how the critical "availability" component of housing will be achieved other than the reference to "*further consider measures to ... Promote and achieve sufficient residential yield*"<sup>39</sup>.
- 56 Again, this is not necessarily a criticism of the Spatial Plan which, in the same manner as explained above in relation to affordability, does not appear to be intended to address the issue of availability. Like affordability, the availability of housing appears to be a matter to be addressed somehow in the future, with the Spatial Plan containing no indication of how it might be addressed.
- 57 I refer again to Mr Meehan's primary evidence and his commitment to deliver 200 residential lots plus 200 residential house/land packages in Stage One of the development<sup>40</sup> which directly addresses the issue of availability

### **Specific comments on Ms Brown's Supplementary Evidence**

- 58 Below I address Ms Brown's paragraphs 63 – 65.
- 59 In Paragraphs 63 and 64 she states that PC13 would significantly impact on the development strategy and design precepts of the Spatial Plan and that, if approved, PC13 would likely create precedent for further applications for satellite development within the rural frame, in particular north and south of State Highway 6.
- 60 I query the use of the term "precedent" in a plan change context, particularly when an imminent district plan review could include urban growth boundaries to prevent uncontrolled urban spread, but I acknowledge that approval of PC13 could influence future considerations.

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<sup>38</sup> Primary Evidence of Chris Meehan dated 23 April 2019, at paragraphs 39-45 on pages 8-9

<sup>39</sup> Spatial Plan dated 29 May 2019, page 061, seventh bullet point

<sup>40</sup> Rule 20.7.7(xii) of the updated RTRA provisions, submitted 21 June 2019

- 61 I do not agree that PC13 could influence future zoning of the land north of SH6 as in my view the highway would act as a significant barrier to urban spread, and in any case the land north of SH6 is either in established production, or has other long-established uses including the Cromwell Race Course and the airstrip.
- 62 I do agree with Ms Brown, however, in relation to land south of the highway and south of PC13 in the Pearson Road area. If PC13 were developed this could signal that the land further south would similarly be appropriate for urban development (assuming infrastructure issues could be appropriately addressed). Mr Ray and Mr Mead have acknowledged this<sup>41</sup>. Development in this location would be consistent with Option 2 of the CMP.
- 63 West of the PC13 land is the rural residential area and the well-established orchard operation. Those existing uses provide a barrier to westward expansion, and this could be reinforced, during the district plan review, by mechanisms such as an urban growth boundary.
- 64 Also in paragraph 64 Ms Brown considers the loss of social licence and / or expectation of a more stringent operational regime for rural activities. I am unsure what is meant by “social licence” in this planning context. I do not consider that more stringent operational regime for rural activities would eventuate, given the various PC13 provisions in relation to reverse sensitivity, as I have discussed previously at length and in reliance on evidence of RTDL witnesses.
- 65 In paragraph 65 Ms Brown considers that PC13 would affect confidence to move forward with intensification and renewal investment for the future “in town” yield (which is the Town Centre sites, the golf course and the Freeway Orchard, and future “churn”). I disagree because, firstly, there is no evidence of that potential outcome, and, secondly, as I understand Mr Meehan’s evidence, the PC13 target market is a different target market to what would take up the in town range of products because of the price points.
- 66 Further, I do not consider that PC13 would negatively affect the development and redevelopment opportunities for a mixed use commercial town centre or the investment in the Arts and Culture Precinct. Rather, the additional population, as with any additional population in Cromwell and in the wider Cromwell Basin, would enhance the viability of those aspirations.

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<sup>41</sup> Evidence of Alastair Ray dated 23 April 2019, paragraphs 7.25 – 7.31; and evidence of David Mead dated 16 May 2019, paragraphs 103 -

## **Conclusion**

67 In my opinion the Spatial Plan focuses on one option for the future of Cromwell but has not assessed other potential options. I also consider that affordability and availability are two issues which are critical to the way Cromwell will address its housing challenges in the future, in enabling the social and economic well-being of Cromwell's current and future generations. The Spatial Plan does not address either of those issues except to make recommendations that they be addressed in the future, without providing any indication of how they might be addressed.

68 I therefore consider that the Spatial Plan is of little, if any, assistance to the Commission when considering PC13.

69 The Spatial Plan and related evidence have not led me to change any of the opinions I have previously expressed in my evidence for this hearing.

**J A Brown**

**28 June 2019**



CROMWELL MASTERPLAN

# LET'S TALK OPTIONS SURVEY ANALYSIS

NOVEMBER 2018





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## INTRODUCTION

The Cromwell Masterplan is focused on three key workstreams that look at how the town grows – the spatial framework, the future of the town centre and civic facilities, and a review of the Cromwell Heritage Precinct and the Memorial Hall. Each workstream had three options shortlisted for the community to consider and provide feedback on.

The *Let's Talk Options* survey was open from Friday 19 October to Monday 19 November. Copies of the survey were available online via the CODC website, from 48 The Mall, Cromwell Service Centre, New World and at locations in the outlying areas.

A total of 477 responses were received. 318 surveys were completed online via SurveyMonkey, 149 hard copies were completed and entered into SurveyMonkey and 10 responses were received via email and did not use the survey format, 5 of which were on behalf of a group or organisation. Some respondents also included additional information that did not fit the survey format this has been summarised and included in this report as appendix two.

This analysis captures the 467 responses inputted into SurveyMonkey.

## DEMOGRAPHICS

The *Let's Talk Options* survey was anonymous but we did ask the community to provide the following information about themselves. These questions were compulsory and all 467 respondents completed them.

### Which of the following age groups do you belong to?

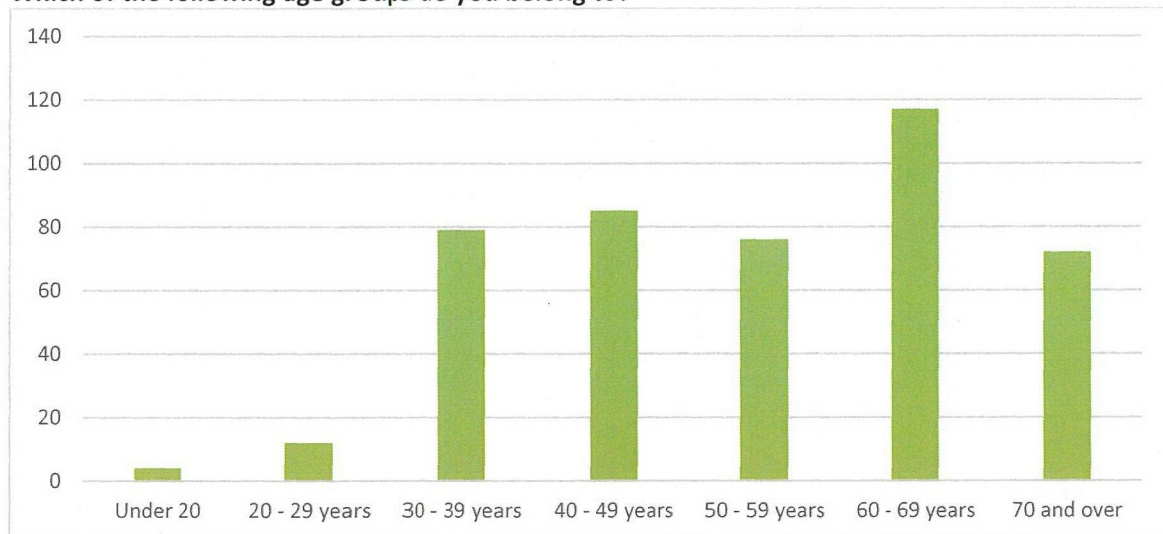


Figure 1. No. of respondents per age brackets

Figure 1 above shows that the data analysed has a slight age bias of 60 years and over with 40% of all respondents falling in this age bracket. The graph also shows we have a very small sample size of those aged 29 years and under.

### Where do you live?

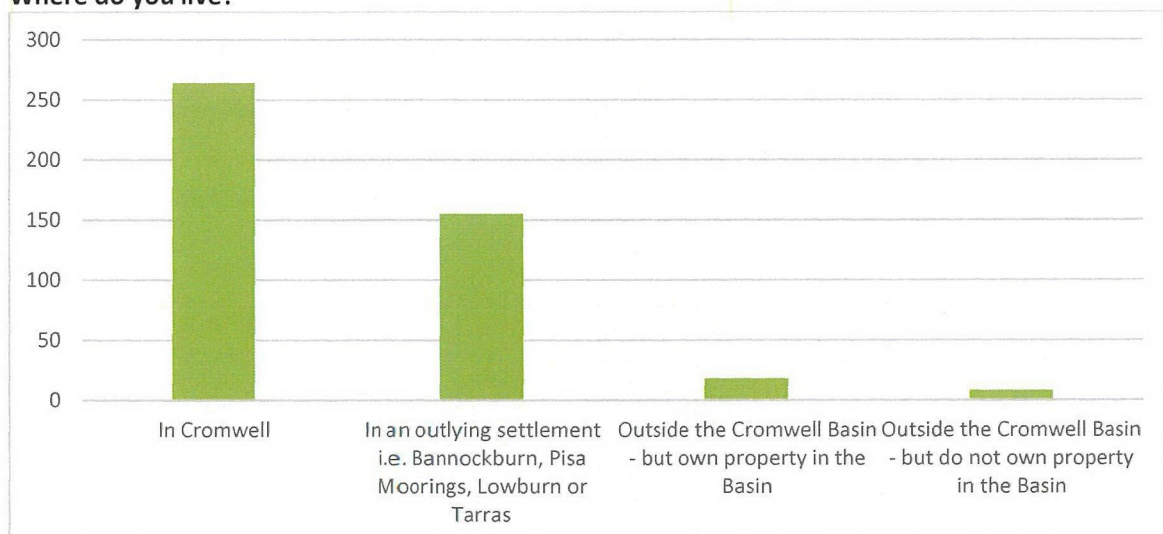


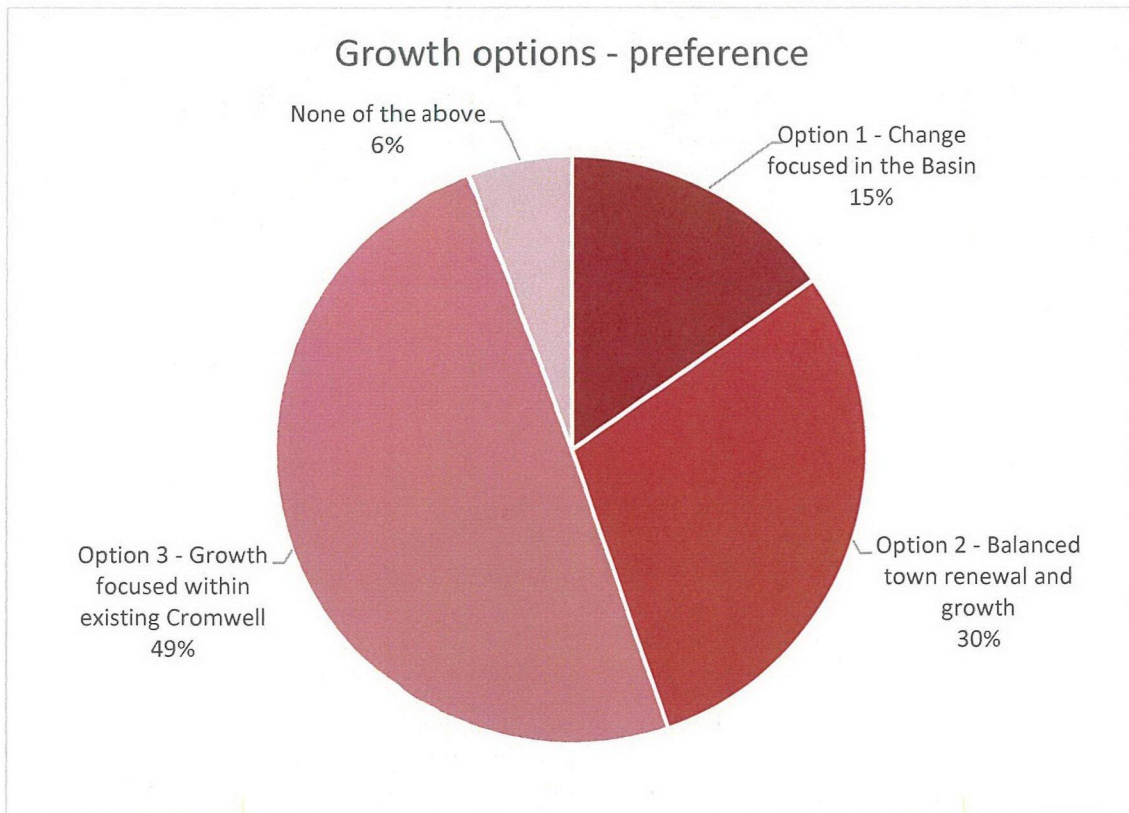
Figure 2. No. of respondents from each location

Figure 2 shows that the majority of respondents live in Cromwell (56%). A very small portion of respondents live outside the Cromwell Basin and of those, only eight do not own property in the Basin.



## WE'RE GOING TO GROW...BUT HOW?

The community was asked which of the three growth options they preferred and why. This question was compulsory with all 467 respondents providing a response.



*Figure 3. Respondent preference for growth options*

### WHY?

There were 422 comments offering reasons why respondents chose the option they did. All comments have been categorised into a list of commonly mentioned themes. The graphs that follow show the list of themes based on the option chosen.

### Option 3 – Growth focused within existing Cromwell (231 respondents)

Figure 4 below shows the list of themes that came through in the comments from respondents who selected Option 3 and the number of times each theme was mentioned.

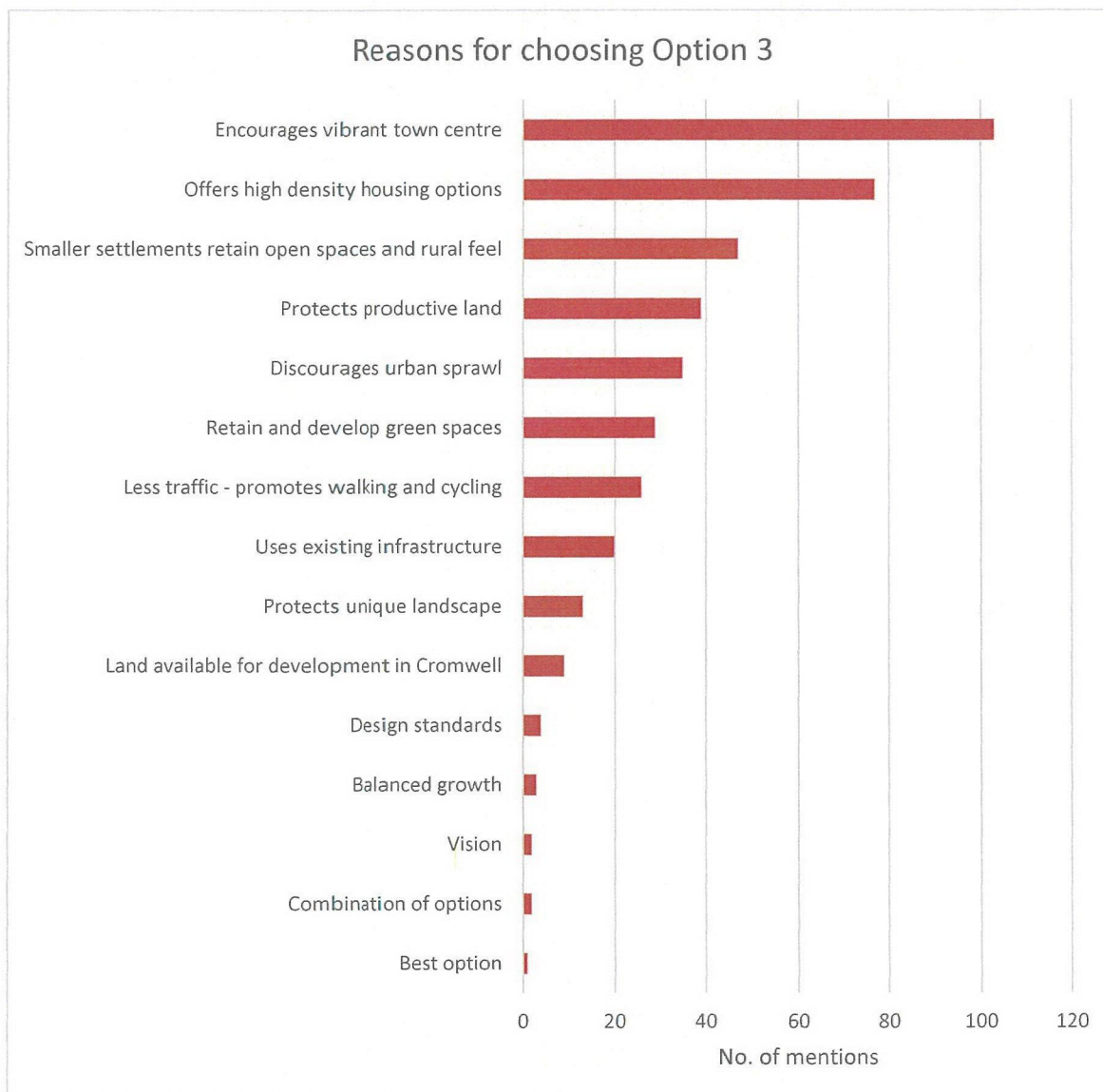


Figure 4. Commonly mentioned reasons respondents chose Option 3

The commentary below provides more detail about the responses for those themes that were mentioned 10 times or more.

#### *'Encourages vibrant town centre' (103 comments)*

People felt that focusing future growth within existing Cromwell township would help create a vibrant and busy town centre. Many said that the focus should be on the existing town first before outlying areas to keep the majority of the population close to existing amenities. Comments suggested that a more concentrated population would 'bring the town back to life'.

#### *'Offers high density housing options' (77 comments)*

Respondents felt that high density housing keeps the town compact and accessible. They said that more people in centralised areas brings them closer to services, businesses, retail and dining

options. They liked the choice and affordability of townhouses, apartment style and high rise housing options and said it will bring people in the community together.

*'Smaller settlements retain open spaces and rural feel'* (47 comments)

Respondents said they wanted the smaller settlements to retain their open space, rural feel and larger section sizes. People felt the smaller settlements can provide a nice contrast to the more built up township and that those who have chosen to live out of town have done so largely for the space it offers.

*'Protects productive land'* (39 comments)

Respondents felt it was very important to protect valuable horticulture and viticulture land. Many mentioned that "this is what Cromwell is known for" and "it's the essence of Cromwell".

*'Discourages urban sprawl'* (35 comments)

Comments mentioned that they did not want the town to spread out and that Option 3 helps create a heart by "keeping people close to infrastructure and amenities".

*'Retain and develop green spaces'* (29 comments)

Respondents said that green spaces (greenways, parks, playgrounds, gardens) must be retained and developed in all future developments particularly with high density housing. Six respondents mentioned it was important to keep the golf course as it is.

*'Less traffic - promotes walking and cycling'* (26 comments)

Respondents felt that more people in town would mean less traffic on roads, less use of vehicles and would encourage more walking and cycling.

*'Uses existing infrastructure'* (20 comments)

Respondents said that infrastructure is already in place with this option and that the population would be close to existing infrastructure. Some also mentioned that infrastructure must be planned well for future growth.

*'Protects unique landscapes'* (13 comments)

Respondents felt this option protects the hills and surrounding natural environment from development and retains the essence of the unique surrounding landscape.

### Option 2 – Balanced town renewal and growth (138 respondents)

Figure 5 below shows the list of themes that came through in the comments from respondents who selected Option 2 and the number of times each theme was mentioned.

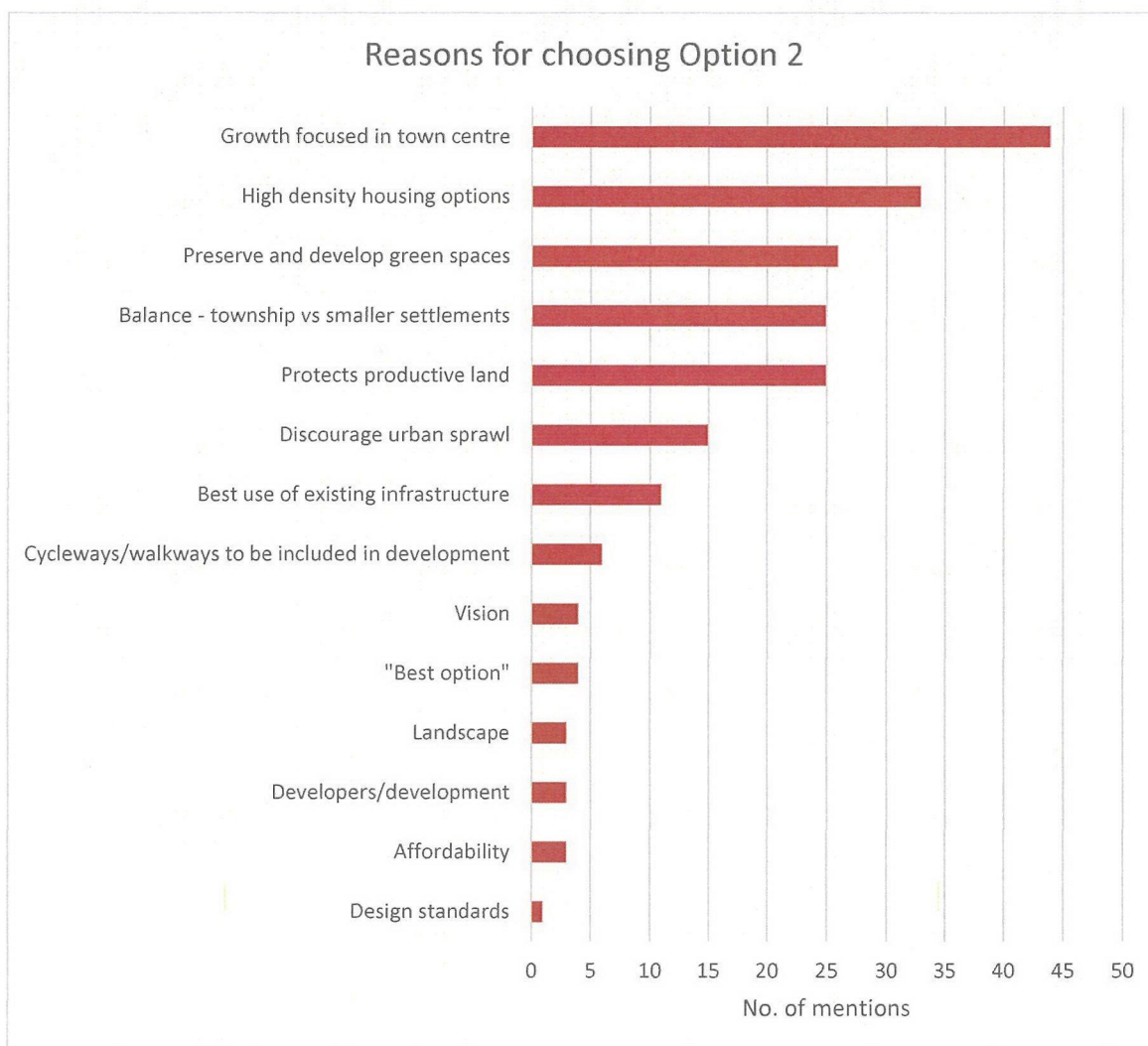


Figure 5. Commonly mentioned reasons respondents chose Option 2

The commentary below provides more detail about the responses for those themes that were mentioned 10 times or more.

#### *'Growth focused in town centre' (41 comments)*

Similar to those who chose Option 3, the most commonly mentioned theme was about focusing growth in the centre of town. Respondents liked the emphasis on a balanced approach to population growth within Cromwell to create a more vibrant town centre, while making good use of the land south of the town when necessary.

#### *'High density housing options' (33 comments)*

Twenty-nine (29) respondents were in favour of the high density housing options in Cromwell town. These respondents mentioned smaller section sizes, townhouses and multi-storey dwellings, 'more people can live close to where they work and shop'. Four (4) respondents who selected this option were not in favour of concentrated residential living such as apartments and infill as they felt it didn't suit the Cromwell environment.

*'Protects productive land'* (25 comments)

Respondents liked that Option 2 allows for expansion and growth while protecting productive land (horticulture, viticulture). Three comments mentioned protecting productive 'tourism' land such as Highlands and speedway.

*'Balance – township vs smaller settlements'* (25 comments)

Eighteen (18) respondents liked that this option allowed for change to occur primarily in the town centre where the majority of the population resides but also allows for growth in the smaller settlements, "Good balance between growth in the basin and increased density in town". Seven (7) respondents mentioned that growth should be focussed in existing Cromwell and that the smaller settlements should have limited growth "keep smaller settlements small as that's what makes them special".

*'Preserve and develop green spaces'* (23 comments)

Respondents felt that this was the best option to preserve green spaces. Enhancing greenways, open spaces and cycleways is very important when providing increased residential concentration "this is part of what makes Cromwell a desirable place to live".

*'Discourage urban sprawl'* (15 comments)

These respondents did not want to see the town spread out too far but thought this option was a good balance between focusing growth in the town centre and having 'room to grow' to the south. Also that this option allows growth in existing areas so that Cromwell doesn't become a series of 'satellite towns'.

*'Best use of existing infrastructure'* (11 comments)

People felt this option makes best use of existing infrastructure within Cromwell, and growth south of the town would be most cost effective. Some mentioned that the smaller settlements don't have the infrastructure to cope with extensive growth.



### Option 1 – Change focused in the Basin (71 respondents)

Figure 6 below shows the list of themes that came through in the comments from respondents who selected Option 1 and the number of times each theme was mentioned.

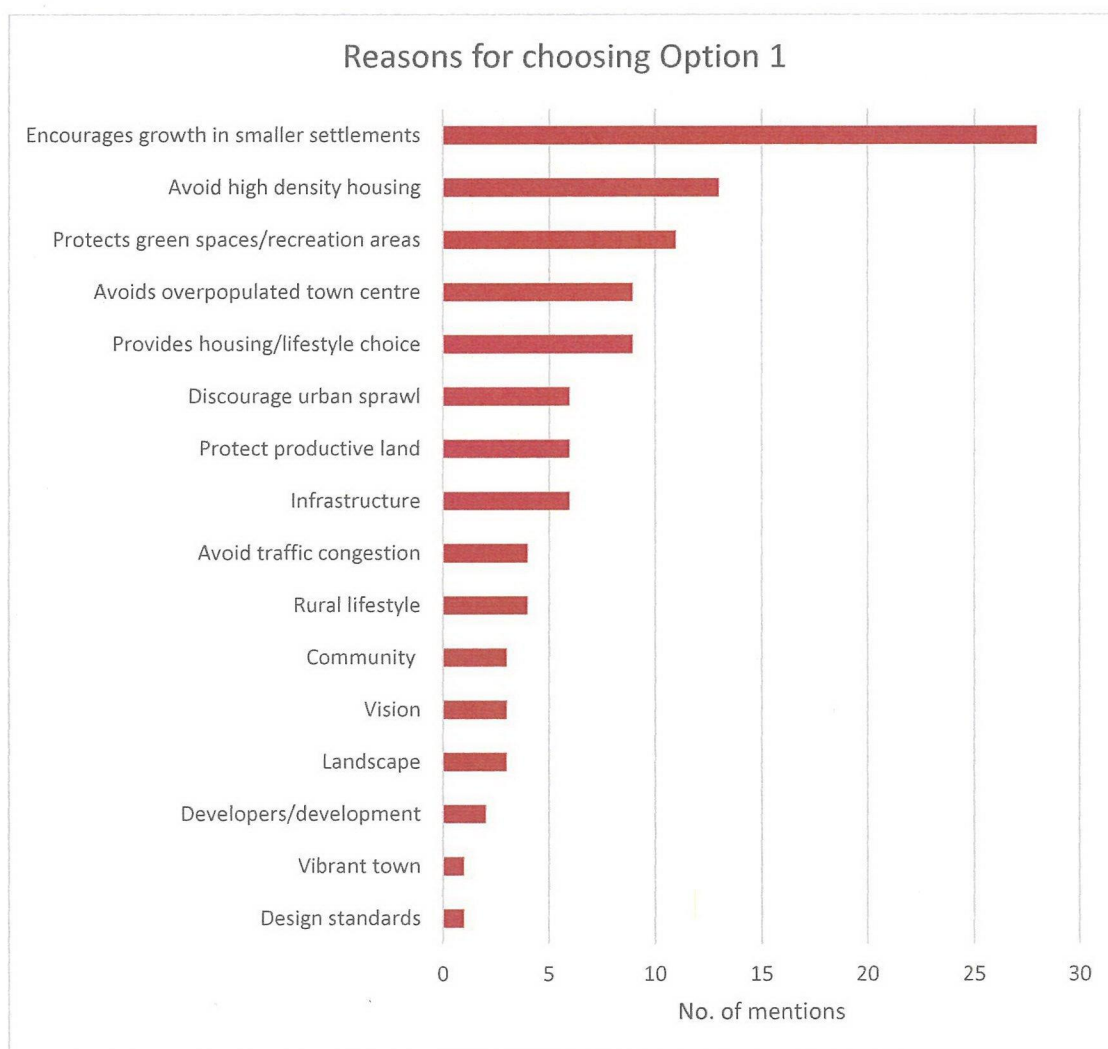


Figure 6. Commonly mentioned reasons respondents chose Option 1

The commentary below provides more detail about the responses for those themes that were mentioned 10 times or more.

#### *'Encourages growth in smaller settlements' (20 comments)*

Respondents said that the smaller settlements have land available and 'room to grow', and that this option allows growth where some infrastructure already exists. It offers people choice of where they would like to live within the Basin. It will relieve pressure on the town centre.

#### *'Avoid high density housing' (13 comments)*

Respondents felt high density housing would change the character of the town and felt this option allowed growth to happen without apartment-style buildings or infill. Some also mentioned that this sort of living was not suitable for families with young children.

*'Protects green spaces/recreation areas'* (11 comments)

Eight (8) comments mentioned that greenways/greenspaces must be included in all future development. Five (5) people mentioned that the golf course must remain as it is.

**None of the above (27 respondents)**

Table 1 below shows the list of themes that came through in the comments from respondents who selected 'None of the above' and the number of times each theme was mentioned.

Theme	No. of mentions
Combination of options – aspects of all options are necessary	12
Town centre should be focus of the growth	7
Growth should occur across the basin	4
Productive land should be protected	3
Community	2
Developers/development	2
Green spaces	2
High density housing	3
Population	2
Rural lifestyle	2
Urban sprawl	2
Vision	2
Affordability	1
Infrastructure	1
Travel/traffic	1

*Table 1. Commonly mentioned themes*

## GROWTH OPTION PREFERENCE BY AGE

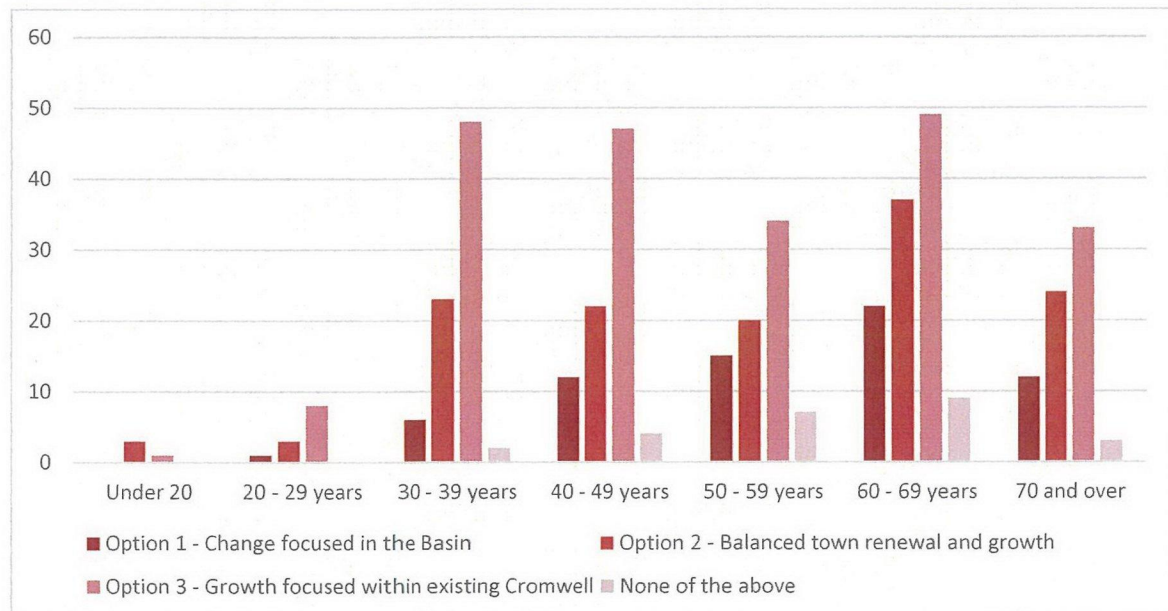


Figure 7. Growth option preference by age bracket

## GROWTH OPTION PREFERENCE BY LOCATION

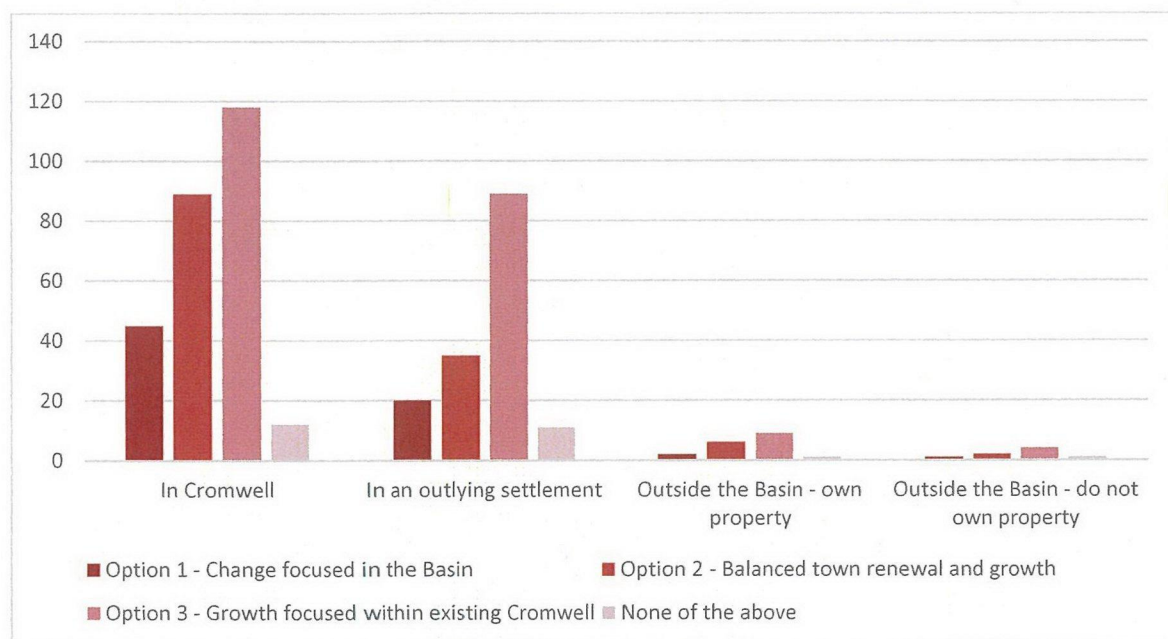


Figure 8. Growth option preference of respondents who live in different areas



## WHAT DID YOU NOT LIKE ABOUT THE OPTIONS YOU DIDN'T CHOOSE?

The community was asked to let us know what it was about the growth options they didn't choose that they did not like. The following provides a summary of the themes that came through strongly in the comments that respondents provided.

### Option 1

A key reason people didn't select Option 1 was to protect the character, values and rural lifestyle of smaller settlements. They also did not want to see the introduction of smaller section sizes. Also mentioned was the impact on services and duplication of infrastructure.

### Option 2

Avoiding urban sprawl was a key factor in people not choosing Option 2, plus wanting a more intense focus on growth in Cromwell to support a vibrant town centre.

### Option 3

Many of those who didn't chose Option 3 for growth focused on Cromwell township had concerns about high density. They felt it would be inconsistent with Cromwell's small town quiet feel and could devalue properties and bring an element of ghetto living. Others, while wanting an option that focused on the town centre, felt too much intensification (as proposed in Option 3) could change the character of the town centre. Concerns around development on recreation land (including the golf course land) were also raised.

## OTHER COMMENTS

The community was given the option to provide us with any other comments about how the town grows.

287 respondents answered and the commonly mentioned themes are detailed below.

### *'Green spaces'* (50 comments)

Density must be balanced with common green areas; retain/enhance walkways/greenways connecting town centre to arts, culture and heritage precinct; important for 'walkability' of the town and recreation; ensure allocation in new subdivisions for adequate green space; green ways and open spaces are part of Cromwell's character that locals value.

### *'High density'* (38 comments)

Those in favour of high density said: 'Upwards not outwards' (urban sprawl); that this will allow greater housing options to be available; acceptable if balanced with greenways. Those not in favour saying 'Cromwell is a destination not a dormitory', concern about losing character of town.

### *'Town/town centre'* (34 comments)

Comments included: the need for links from residential developments to the town centre ensuring connectedness and 'cohesion'; 'fill up the town first' / use up undeveloped land first / make better use of sections already available; grow the middle of town to make it vibrant for everyone.

Comments also related to the success of the town centre and heritage precinct workstreams hinging on growth within the Cromwell township itself.

*'Vision'* (28 comments)

Comments included: think big and outside the box; more forward planning needed rather than ad hoc approvals and thinking; need forward thinking ideas to take us from a former 'ministry town' to an amazing modern town.

*'Traffic/ travel'* (26 comments)

Commenters wanted a pedestrian and cycle friendly town. They felt consideration must be given for (free) transport between the town centre and heritage precinct. Looking further out people desired cycle connections from Bannockburn to Pisa via Cromwell to make commuting by bike feasible for some of the outlying settlements. Calls were made for an urgent consideration of transport options alongside housing growth - not just more car parking; otherwise people were concerned we could end up with traffic congestion like our neighbours in Queenstown. Also a suggestion that we go a step further to look at the 'whole journey' and do things such as requiring new office buildings to include showers for staff and secure bike parking, and to make sure all streets in Cromwell have cycle lanes. The need for new residential areas to have sufficiently wide streets was also raised.

*'Recreation'* (23 comments)

Comments included: with smaller residential sections being introduced it was increasingly important for people to have recreation areas so retain all sporting facilities within the town boundaries (including the golf course). Those that seemed okay with development on the golf course suggested places it could move e.g. out near Highlands. There was a call to ensure there are plans in place for sporting/recreation facilities to cater for population growth.

*'Developers'* (20 comments)

Comments very similar in message – to stop developers controlling the growth and that the community should be the ones to direct the future growth.