

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

Plan Change 19 – Stage 2

UNDER

the Resource Management Act 1991

IN THE MATTER

Plan Change 19 – Stage 2

STATEMENT OF EVIDENCE OF BRODIE TYLER COSTELLO,

ON BEHALF OF LANDPRO LTD

15 May 2023

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QUALIFICATIONS AND EXPERTISE

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

CODE OF CONDUCT FOR EXPERT WITNESSES

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

SCOPE OF EVIDENCE

6. I have largely limited this submission to the matters raised in our submission. Landpro has provided additional comment on some information that was not publicly available at the time of our submission.

COMMENT ON PLANNING REPORT

7. I have read the recommending report prepared by Ms White. Generally, Landpro is supportive of the proposed recommendations. Where Landpro is not in agreement, this has been expanded on below.

Future Growth Overlays

8. Landpro considers that the Future Growth Overlay (FGO) has limited value for the residential chapter. Ms White notes that constraints to development in FGO areas is that servicing is not yet available. Landpro considers that this is somewhat contradictory, given that there are very few greenfield developments where servicing would exist prior to a development. New developments are often driven by private developers, who pay for the construction and/or extension of the associated services as part of subdivision works.
9. FGOs have limited value if a future plan change process is still required in order to change the zoning. FGO areas should be allowed to progress where adequate servicing exists or a developer can show demonstrate that suitable servicing can be provided. Developers have to pay development contributions, which should be used to bring forward any potential central service facility upgrades when they are needed ahead of time. Development in the district should not be determined by current planned service upgrade timeframes, particularly where demand for new developments exists and developers are paying for the associated servicing.

Expansions to the South and West of Bannockburn

10. Landpro supports Ms White's recommendation to include 48 & 50 Lynn Lane in the LLRZ.

11. Landpro would be supportive of a spatial planning exercise for the Bannockburn area as suggested by Ms White, to ensure that areas that could be easily serviced or are currently serviced (such as Lot 50 DP 511592 on Lynn Lane) are appropriately zoned.

Cromwell Yield Assessment

12. Landpro does hold concerns around the Cromwell Yield Assessment (provided by Ms White as Appendix 2 of her Section 42A report), and how this has been used for the identified zonings.
13. Landpro notes that the forecasted demand and supply of housing explicitly includes Bannockburn and Pisa Moorings, both of which Council are seeking to exclude as part of considering whether Cromwell forms an 'urban environment' as per the National Policy Statement on Urban Development (NPS-UD). Council needs to clarify whether or not Cromwell and surrounding area forms an 'urban environment'. If so, then revisions are required to ensure that PC19 meets the requirements under the NPS-UD. If not, then Bannockburn and Pisa Moorings should be reconsidered to ensure that there sufficient land appropriately zoned as residential in these areas to support new development and provide for the predicted required housing.
14. Landpro notes that in the four-year period since the Cromwell Housing and Business Development Capacity Assessment was prepared (in 2018), there was a 25% increase in the projected demand for housing (from 7,700 in 2048, through to 9,700 in 2054). This is a significant increase in demand. Landpro further notes that the proposed levels of development forming the yield calculations included three potential plan changes (The Golf Course in Cromwell, Cherry Orchard in Pisa Moorings and Parkburn in Pisa Moorings). Landpro considers that these plan changes are outside of the control of Council, and there is no guarantee when these developments will take place, if at all. We further note the reference to the golf course development being less feasible, "resulting in a potential reduction of around 800 houses".

15. Landpro further notes that the assessment specifies that most of the additional capacity (yield from PC19) "is generated in Urban Cromwell where there is many Low Density lots". Similar to the potential plan change areas identified above, there are no guarantees as to when conversions of current section sizes to smaller sizes would take place, if at all. Relying on redevelopment of existing land is inherently difficult to achieve in practice, due to the funds needed to redevelop land and the high cost of upgrading existing services to meet future demand. For many landowners, a subdivision may not be economically viable, or may be limited by existing house locations or services. For example, when a house is positioned central to a large lot, there is often insufficient space remaining to create an appropriate new lot. There are parts of old Cromwell where there are 800m² section sizes that could be subdivided - however the underlying wastewater pipes will need to be upgraded prior to any development being able to be progressed, which is a significant barrier for most private landowners.
16. Landpro considers that Council needs to provide a greater area of potential further development in order to meet need. Having different development options available will better provide for the supply of housing in response to market demand. The timing for developments being completed is inherently uneven, and making more options available will better accommodate this variability as the district develops. This could be provided through increased areas of higher density of new areas of residential land, or identifying additional residential zoning for suitable greenfield areas, to provide developers with security for investment when there is demand for new development.

SUMMARY

17. Overall, Landpro, Ltd is generally supportive of the recommendations by Ms White as identified in her Section 42A report, however do consider that some further changes are required, as described above.

Brodie Costello

A handwritten signature in blue ink, appearing to read 'Brodie Costello', with a stylized, cursive script.

Planner – Landpro Limited

15 May 2023

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