

BEFORE THE CHRISTCHURCH CITY COUNCIL

UNDER the Resource Management Act 1991

IN THE MATTER of Proposed Plan Change 10: Partial Removal of Meadowlands Exemplar Overlay

APPLICANT Spreydon Lodge Limited

STATEMENT OF EVIDENCE OF MARK BROWN

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1 INTRODUCTION

- 1.1 My name is Mark Bernard Brown. I am a Director and Planner with Davie Lovell-Smith, Planners, Engineers and Surveyors of Christchurch.
- 1.2 I have a Masters of Regional and Resource Planning from the University of Otago. I have practiced in the field of resource management for 25 years. During the time I have assisted a wide range of public, private and corporate sector clients on a wide range of planning and resource management issues and projects.
- 1.3 Of relevance to Plan Change 10 is the experience I have accrued in respect of large-scale greenfield land development projects. In recent times, I have provided resource management services in relation to the following residential and industrial developments:
- Halswell Commons, Halswell – 81 lots
 - Meadowlands, Halswell – 150 lots
 - Knights Stream Estates, Halswell – 60 lots
 - Faringdon, Rolleston – 3000 + lots
 - Barton Fields, Lincoln – 150 lots
 - Preston Downs, West Melton – (latter stages) 120 lots
 - Karamutu Oaks, Leeston – 190 lots
 - Highland Park, Mosgiel – 300+ lots
 - IZone (Industrial), Rolleston
 - Hornby Quadrant (Industrial), Christchurch
- 1.4 I have been either directly involved or have overseen all of the resource consents that have been required in respect of the Meadowlands Exemplar / Halswell Commons development to date.
- 1.5 I confirm that I have read and am familiar with the Code of Conduct for Expert Witnesses in the Environment Court Consolidated Practice Note (2006). I agree to comply with that Code. Other than where I state that I am relying on the evidence of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

2 SCOPE OF EVIDENCE AND SUMMARY OF OPINION

2.1 My evidence addresses the following matters:

- (a) A summary of the consenting history of the Meadowlands Exemplar
- (b) Issues Encountered in the Development and the rationale for Plan Change 10
- (c) Brief comments on s 42A Report.
- (d) Brief comment on the submission

2.2 My evidence will illustrate that despite the best intentions of the developer and Council, the Meadowland Exemplar has not achieved its intended purpose.

2.3 The notion of Exemplar developments was introduced via the Land Use Recovery Plan (LURP). In referencing Exemplar projects, the LURP states:

Councils will work collaboratively with interested developers and other agencies to undertake exemplar developments demonstrating that good quality medium density housing can be built cost-effectively and that, at the right price, there is a significant demand for it. These will be models for future housing developments, providing affordable, attractive and energy-efficient medium density housing suited to the location. Associated measures to promote intensification, such as improving public spaces and amenities, are also encouraged.¹

2.4 First and foremost, there can be no denying that the rules framework for delivering the Exemplar contained within Chapter 8 Subdivision of the Christchurch District Plan has proven to be unfit for purpose. This is illustrated by the requirement to obtain multiple additional land use consents for individual allotments within the development.

2.5 In light of the Exemplar delivery moving beyond the Rules contained within Chapter 8 and given the difficulties that have been identified in Mr Thompson's evidence, the removal of the Exemplar Overlay from the balance of land within the North Halswell ODP is, in my view, the most appropriate means to deliver residential land and keep pace with the Christchurch housing market.

3 EXEMPLAR RESOURCE CONSENTS

3.1 The Exemplar Overlay (EO) and rules contained within Section 8.8.15 of the District Plan were formulated solely for the purpose of delivering a design-build medium density housing development. The central premise of the Exemplar

¹ Land Use Recovery Plan at p.18

philosophy was to mitigate typical cross-boundary effects by design, as opposed to controlling such effects by a series of generic built form standards.

- 3.2 The Exemplar philosophy and delivery mechanism was visionary and perhaps somewhat radical for Christchurch and failed to capture the interest of the local construction industry. As a consequence, Danne Mora was unable to align themselves with a building or construction partner.
- 3.3 Not to be deterred, nor willing to abandon the Exemplar before it had even started, Danne Mora embarked on a strategy to showcase the merits of the Exemplar by obtaining resource consents for the first stage of the development.
- 3.4 The strategy revolved around designing houses in accordance with the EO requirements, in the hope of marketing and selling the lots with associated designs that could be individually built by the purchaser.
- 3.5 The combined subdivision and land use consent application included house designs for the first 13 housing units and were accompanied by the necessary supporting documents including the Neighbourhood Plan which consisted of a Context and Site Analysis, Detailed Design Statement and Neighbourhood Plan Set
- 3.6 Mr Thompson's evidence explains how the level of interest in these units was slow. In addition to the slow uptake, it is worth noting that whilst the typologies (stand alone, duplex and terrace) have remained the same, all 13 pre-designed units have been amended by way of further resource consents.
- 3.7 A similar approach was adopted for the next stage of the development (Stage 1A) which followed shortly after consent for Stage 1 was obtained. Stage 1A consisted of 18 lots with fully designed houses for each of the lots. The uptake of lots in this stage was slightly more popular, largely in part due to a greater proportion of stand-alone lots within this Stage. As with Stage 1, all original house designs within Stage 1A were subsequently amended by resource consent prior to respective purchasers confirming their sale and purchase contract.
- 3.8 In acknowledgement that pre-designing houses for individual lots was futile, a stand-alone subdivision consent was sought for Stages 1B-4. The subdivision consisted of a series of development blocks, that could be developed in line with the original EO intentions, albeit on a smaller scale. There were 22 development blocks in total, each consisting of future development yields ranging from 2 units to 9 units.
- 3.9 To accompany the subdivision consent, a revised and simplified design guide was prepared in conjunction with Council in the hope this would stimulate

interest from group home builders. Although the development block consent included considerably more design autonomy for future units than earlier stages of the Exemplar, the approach failed to attract the necessary interest and was abandoned.

- 3.10 Included within the development block subdivision were 10 stand-alone lots that were to be developed under RNN conditions. Due to the fact they shared a boundary with existing lots fronting Hendersons Road, it was decided that in the interests of consistency, these lots should effectively 'mirror' what had already been developed along this Road. The lots ranged in size from 538m² to 621m² and were created with a consent notice that 'imposed' RNN built form standards. The lots were quickly sold and built upon within a short timeframe following titles issuing.
- 3.11 At this point it was evident to all parties a significantly different strategy to delivering the Exemplar was required. Danne Mora proposed to overhaul the design rationale underpinning the EO by seeking a 'global' subdivision and land use consent that retained core components of the neighbourhood plan, whilst also encompassing rules from the more-familiar RNN and Residential Medium Density zones. Although the 'global' land use consent approach was supported by Council, there was less support for the inclusion of Residential Medium Density rules with more bespoke design controls favoured by Council.
- 3.12 Following much debate and discussion these bespoke controls were eventually included as conditions in the 'global' land use consent.
- 3.13 The 'global' consent incorporated Stages 2A-3D of the development and consisted of 61 lots (81 household units).
- 3.14 Although this most recent approach has facilitated the highest levels of development within the Exemplar, it hasn't lessened the extent of site-specific resource consents needed to achieve these levels.
- 3.15 The 'global' land use consent has been varied for multiple sites as the conditions which dictated the house designs were constantly challenged, along with design related matters inserted into the Neighbourhood Plan.
- 3.16 The summary of how the Exemplar has been delivered to date clearly illustrates the failings of the EO framework to deliver on anticipated outcomes. The delivery of the Exemplar to date has been achieved through a varied and extensive series of consents and this is a clear signal the current framework isn't appropriate.
- 3.17 In total, the Exemplar has delivered 94 lots with provision for 122 households. Of the 122 households, 68 are of a stand-alone typology (78%), 42 households are part of a duplex (23%) and 12 households (4%) are part of 4 terrace

developments. In addition, one lot has been set aside for an apartment complex housing 8 units. This apartment site has yet to be sold.

4 PRIVATE PLAN CHANGE RATIONALE

- 4.1 There are two primary factors behind the decision seeking to remove the EO by way of private plan change:
- (a) To decouple the subdivision and landuse delivery mechanism and to simplify the conditions under which development can occur within the Spreydon Lodge landholding; and
 - (b) To remove the unique and prescriptive design parameters inherent to the Exemplar development.
- 4.2 The joint subdivision and land use consent approach creates a layer of complexity that has acted as a disincentive to prospective purchasers within Halswell Commons. Rather than both endure the layers of design input and be directed towards the type of typology they must build, purchasers have looked to alternative (RNN) developments within the same ODP area where they can have far greater design autonomy and develop under traditional conditions.
- 4.3 The success of RNN development within the Exemplar and elsewhere within the North Halswell ODP area illustrates the significance of providing a familiar framework which enables purchasers and designers to be guided by built form standards and elect to design without the need for a resource consent if so desired.
- 4.4 Due to the very specialised nature of design parameters informing the Exemplar, first through the Neighbourhood Plan and latterly via a 'global' landuse consent, securing site (design) specific resource consents has become an increasingly frustrating undertaking.
- 4.5 Firstly, the conditions of the global consent are by nature, very specific and therefore a design either complies or it doesn't. This has become problematic on many levels but especially because this approach doesn't allow for context to inform design.
- 4.6 For example, Condition 4C requires windows facing the street must be vertically oriented. Units are frequently designed with the kitchens overlooking the street (consistent with passive surveillance and so living areas connect with outdoor space), however horizontal windows that extend along a benchtop do not meet the vertical orientation requirement and therefore need consent.

- 4.7 Exemplar developments are required to be built to a higher energy efficiency standard (Conditions 27, 28 & 29). Yet if a dwelling has a southern façade facing the street, this needs to include a minimum of 15% glazing (Condition 4C) and a hinged front door (Condition 4A).
- 4.8 An especially frustrating requirement for purchasers and designers has been the minimum and maximum setback requirements contained in the Neighbourhood Plan. This instrument differs to typical built form setbacks in that it is seeking to achieve interaction between buildings and the street i.e. encourage building closer to the road boundary.
- 4.9 For sites which are located on the western side of the road or central reserve, this requirement works well as it maximises the extent of outdoor area to the rear of the dwelling whilst also allowing for greater solar access.
- 4.10 For sites on the eastern side of a road or reserve however, this is problematic as the part of the site with the best solar access is the front yard, yet outdoor areas cannot be established there and therefore neither can ground floor living areas.
- 4.11 This design initiative has been strongly supported by Council Officers on the premise of engagement with the street and (ironically) ensuring passive surveillance.
- 4.12 The subjective nature of many of the design requirements within the Exemplar is no better illustrated than the requirement for all sites to have a minimum 28 roof pitch and open-ended gables. Such a condition is counter-intuitive to inducing variety and design interest within the streetscape as the suite of conditions limit the amount of variety that can be introduced.
- 4.13 Compare this requirement to the Comprehensive Medium Density requirements in the Selwyn District Plan which includes variety as a key consideration within matter of discretion 4.12.2.1 (d) which states:
- Provide visual breaks by varying the alignment of dwellings and variation in dwelling type and form. In general the same design should not be used for more than 6 adjacent dwellings where they are an attached terrace, or more than 4 dwellings where they are detached or semi-detached townhouses.*
- 4.14 It is my opinion that the design rationale that underpinned the original Exemplar approach was finely tuned to such an extent that even the most minor changes had unintended consequences of considerable significance. Although changes were made with the best intentions of making the Exemplar more workable, they have had the opposite effect.

- 4.15 A further related matter has been the internal conflicts within Council that have contributed to the difficulties and frustrations associated with the Exemplar.
- 4.16 This conflict is perfectly illustrated within the Appendices to Ms Dixon's s42A report. The central link reserve is a key component of the Exemplar design, as are the use of edge lanes and rear lanes to reduce the dominance of vehicles and garages on the streetscape.
- 4.17 Despite the importance of the reserve network, Mr Wedge from the Parks Unit (Appendix 5) states:
- The Parks Unit does not consider that the neighbourhood reserve or the green corridor in the ODP needs to be retained or are necessary in the proposed Plan Change 10 area.*
- 4.18 The position conveyed by Mr Wedge is consistent with previous advice for the Stage 2A-3D subdivision, whereby the applicant removed a neighbourhood reserve, removed edge lanes bordering the central reserve and reduced the width of the central reserve at the request of the Parks Unit.
- 4.19 The Urban Design report (Appendix 4) identifies the significance of the central reserve within the Exemplar and in response to Mr Wedge's comments states:
- I consider that there are some potential refinements that could be made to the overall extent of the central green link as required by the North Halswell ODP that might address their concerns while balancing good urban design. I would not however support its removal in its entirety from an urban design perspective.*
- 4.20 This internal conflict within Council is unlikely to be resolved until such time as a consent is lodged which brings the matter to a head. This approach has caused frustration, delays, cost and multiple design iterations in the past and is something that the removal of the EO will help resolve.
- 4.21 Comments from the Parks Unit in response to subdivision consents lodged for previous Stages 2A-3D were consistent with the position conveyed in the report appended to the S42A report. Reserve areas were too generous and needed to be removed and refined.
- 4.22 In response to these comments, the central reserve link was narrowed in a bid to reduce the extent of reserve being offered within these stages of the Exemplar. Aside from highlighting the tension with Council regarding the Exemplar, this example also highlights my earlier statement that the Exemplar design package is highly sensitive to change. This is expanded upon further below.

- 4.23 The area taken out of the reserve was re-apportioned into the residential lots fronting the reserve. This action had a profound design and cost implication on Stages 2A-3D. In summary:
- The lots became slightly longer and slightly disproportional in terms of length to width ratio.
 - Dwellings were still required to be located within the maximum and minimum setbacks which were close to the reserve.
 - Due to cost of constructing a standalone garage structure, internal access garages were preferred. To my knowledge no standalone garage has been used in the Exemplar.
 - As a result of the length of the sites and the forward location of the dwelling, long driveways were required – an added cost centre.
 - An inordinate amount of hard surfacing has resulted from a concept that was originally seeking to reduce the extent of hard surfacing.
- 4.24 An additional failing of the rear lane concept has been the removal of edge lanes from the initial design concept. These lanes worked in tandem with the rear lanes and were one-way lanes that extended along the boundary of the lots and the central reserve. Intermittent parking bays were included. The function of these lanes was primarily to give the lots an 'address' and a front door, other than rear lane access.
- 4.25 The removal of these lanes effectively removed the functional front door access from these units along with the removal of additional parking. The implication arising from this is that visitors now use rear lanes to access the dwellings and utilise the lanes for temporary parking. The lanes do not include a legal right to park and this behaviour cause conflict amidst residents as Mr Thompson will attest.
- 4.26 Unintended consequences such as the above may not be imminently obvious to those not involved with the Exemplar, however they are a symptom of the constant amendments that have taken place to the Exemplar concept and delivery mechanisms that have occurred since 2017.

5 SECTION 42A REPORT AND URBAN DESIGN

- 5.1 I have read the Section 42A report and attached Urban Design memo upon which the Planning Officer relies significantly to draw conclusions in respect of matters relating to design and density outcomes arising from the plan change.

- 5.2 I have also read the attached memos in respect of Infrastructure, Transport and Parks which have not been given the same level of prominence within the Officer's conclusions.
- 5.3 I agree with the final recommendation of the Planning Officer to approve Private Plan Change 10, however I disagree with the caveat attached to the recommendation which supports the inclusion of a suite of additional design rules that could be included subject to legal confirmation.
- 5.4 My comments in respect of the Officer's report will focus on the Officer's conclusions in respect of Urban Design matters along with the Urban Design assessment contained within Appendix 4 of the report.
- 5.5 The tension between built form outcomes arising from the Exemplar (or a revised form of Exemplar) and the RNN zone is addressed at length within the Officer's report.
- 5.6 The central premise of this tension is an assumption that RNN will not deliver the same level of housing density as the Exemplar has, coupled with the assumption that RNN will not deliver the same level of housing variety and typologies as the Exemplar has.
- 5.7 This position is clearly encapsulated in p8.1.23 of the Officer Report which states:
- A fundamental question is, even if the Exemplar is uplifted, whether specific elements of the Exemplar provisions are still appropriate for the PPC 10 area or are more appropriate than standard RNN provisions. Ms Jane Rennie in her evidence has concluded that the removal of the Exemplar will likely result in a suboptimal urban design outcome within the PPC10 area, including a lower density of development, limited housing mix and a reduction in the visual interest, amenity and overall cohesiveness and legibility of the built form. I agree with this conclusion.*
- 5.8 I strongly disagree with this position.
- 5.9 In regard to the matter of density, the minimum net density requirement within RNN is 15 households per hectare. I stress this is a minimum. The assumption that reverting to RNN zoning will automatically trigger a reduction in density is not substantiated.
- 5.10 The overriding preference for adopting RNN zoning is that it removes the complex consenting framework as well as the prescriptive design controls that currently have a vice-like grip on individual house design.

- 5.11 Development at densities greater than 15hh/ha is achievable within RNN, as are different housing typologies such as townhouses and duplex developments.
- 5.12 In this regard I reference the Karamu residential subdivision along Yaldhurst Road which was once part of the Riccarton Racecourse. Ironically this site was also one of the original Exemplar sites identified within the LURP but was never progressed. This development is zoned RNN and exhibits densities that are greater than 15hh/ha and also includes a mix of two-storey townhouses and duplex units.
- 5.13 The key point around the density and yield that occurs within RNN is that such factors are predominantly dictated by market forces. Developers seek to create a product for which there is demand. There is no aversion to providing smaller sites (capable of accommodating different housing typologies) if there is a market for them. The simplest level of feasibility assessments will show that the net realisation (\$/m²) for smaller sites is more favourable than for larger sites. Essentially, the profit and risk component of selling 2x 300m² sites is far greater than selling 1 x 600m².
- 5.14 The key determinant to providing density above the prescribed 15hh/ha is that there needs to be a market for it. The Exemplar development clearly illustrates that forcing density and imposing housing typologies onto the market does not work.
- 5.15 Comparisons between density achieved within the Exemplar and what is likely to arise within the RNN are assumptive and also lack context.
- 5.16 In p8.1.29 of the Officer's report, the Officer agrees with comments made by the urban designer which state that *a standard RNN zone is likely to result in a slightly lower density and potentially larger lot sizes than the existing Halswell Commons area*. No evidence is provided in support of this statement.
- 5.17 The existing Halswell Commons development covers an area of 8.9589ha and has provided for 130 housing units, including an apartment site consisting of 8 units. For the avoidance of doubt a plan has been prepared which identifies the calculated areas of the existing Exemplar development and the proposed plan change area. The plan is included as **Attachment 1**.
- 5.18 Applying the net density calculations whereby the Heritage Park and areas set aside for stormwater are excluded, the net development area is 7.9444ha. With a yield of 130 household units, the net density for the existing Exemplar area is 16.36hh/ha.
- 5.19 It is also worth noting that although the Monsaraz Boulevard collector road has been created through the Exemplar subdivision process, the road is excluded

from density calculations as it forms part of the Commercial Core zone (refer Planning Map in Appendix 1 of the Officer report). Through recent consent processes Council have confirmed collector roads are not excluded from net density calculations. If this road were included in the overall net density calculation the net density calculation within the Exemplar would be considerably less.

- 5.20 The density comparison between the Exemplar and any future RNN development is not as pronounced as the Planning Officer and the Urban Designer have assumed.
- 5.21 Alongside the assumptions around density is the position of the Parks Unit which clearly indicates a continuation of the existing level of greenspace and reserves will not be supported in the plan change area. Based on this advice it is likely that RNN densities of 15hh/ha will deliver a commensurate number of households as the Exemplar has to date.
- 5.22 The balance of the EO has an area of 9.6791ha. If reduced levels of reserve areas were provided, there is greater land available to be developed. Depending on the area excluded for stormwater treatment and conveyance, the plan change area could yield up to 145 households if it were developed at 15hh/ha.
- 5.23 The uncertainty created by the Parks Unit's position is telling in the context of this plan change.
- 5.24 Higher densities are supported by the Urban Design and Planning Officer, but the provision of additional levels of greenspace to support the increased density is not supported by the Parks Unit.
- 5.25 The Officer supports the notion that higher density developments require greater design controls, yet Council's position is that streetscape quality and interface treatment is solely the domain of the developer and enhancements within the public realm are to achieve the bare minimum standard regardless of density. I do not believe this is an optimal combination, rather it places an imposition on the future delivery of residential development in the plan change area that isn't sustainable.
- 5.26 I also disagree with the sentiments expressed in para 8.1.38 in regard to achieving 15hh/ha within the RNN zone and the prevalence of a 'pass the parcel' approach.
- 5.27 From a consenting perspective the burden of proof supporting a minimum 15hh/ha for RNN subdivisions has been set incredibly high by Council as supported by the standards referenced in the Officer's report in p8.1.28.

- 5.28 The Planning Officer and Urban Designer are of the view that the plan change area is unique (p8.1.24 and p 8.1.25) and that reverting to RNN is not appropriate to the North Halswell ODP. I disagree with this assertion.
- 5.29 The plan change area is no different to the RNN areas located south of the ODP 'ring road' around the KAC that has yet to be developed. Factors such as proximity to the future town centre, proximity to community facilities and key transport corridors have been identified as being unique to the plan change yet, yet all of these factors can equally be applied to the aforementioned RNN area.
- 5.30 Both the Planning Officer and Urban Designer have been very critical of the outcomes occurring within the RNN zone. I do not believe the RNN zone is as flawed as it is being represented.
- 5.31 The RNN zone is supported by a robust objective and policy framework addressing matters such as design, variation, integration & connectivity, open space, density and Comprehensive Residential Development.
- 5.32 Supporting the objective and policy framework is a series of built form standards and assessment matters, including a specific suite of assessment matters for the RNN.
- 5.33 All of the matters that have informed the Planning Officer's and Urban Designer's proposal for an Enhanced RNN can be achieved within the existing RNN zone. There is no requirement for a 'bespoke' addition to this zone for the plan change area.
- 5.34 I do not agree that the 'Enhanced' RNN model being promoted by the Planning Officer and Urban Designer is a better solution than the adoption of RNN zoning. If the 'enhanced controls' (including density) were to be approved in combination with the aversion to open space provision as expressed by Mr Wedge from the Parks Unit there is the very real risk that the proposed Enhanced RNN will appear as a small area of medium density that has no tangible links to the adjoining Exemplar development or the surrounding RNN area.
- 5.35 One of the rationales for removing the EO has been to decouple the need for a joint subdivision and landuse consent application required under the framework of Chapter 8 Subdivision in the District Plan. The 'Enhanced RNN' proposal includes no reference to where the design controls and density recommendations will sit in terms of the District Plan. There is no analysis supplied as to how the 'enhancement' aspect of the recommendations will be given effect to.

- 5.36 On this premise, I therefore have to assume that the status quo is preferred and that the enhanced RNN mechanisms will replace the Exemplar mechanisms.
- 5.37 This outcome is therefore replicating conditions under which the Exemplar is currently being delivered, and which are untenable.
- 5.38 The recommended Enhanced RNN proposal will see subdivision and landuse activity remain inextricably linked and housing typology, height and design appearance will all be pre-determined with little autonomy or priority given to the person who will own and live in the dwelling.
- 5.39 Although variety in housing typology is being sought by the Urban Designer and Planning Officer, design controls will ensure every building looks the same. Any prospective purchaser wishing to alter the design of their dwelling beyond the enhancement controls will require a site-specific resource consent.
- 5.40 The Planning Officer's support of the Enhanced RNN concept, which is subject to legal advice, seeks to effectively create a Hybrid Exemplar and replicate the conditions under which development is currently being delivered.
- 5.41 Although I support the decision to approve the plan change request, the position expressed by the Planning Officer in regard to the Enhanced RNN option is recreating a level of complexity and a degree of prescriptiveness that the Plan Change seeks to remove. Accordingly, I do not support any additional recommendations beyond the removal of the EO.
- 5.42 From a wider North Halswell ODP perspective, Manarola Road serves as a logical delineation point to differentiate between the existing Exemplar development and the potential future RNN zoned land that is the subject of this Plan Change.
- 5.43 Manarola Road will effectively function as a ring road that separates the Key Activity Centre from RNN zoned land within the Spreydon Lodge landholding and the neighbouring site owned by General Distributors Limited.
- 5.44 There is nothing unique to the Plan Change site that suggests it should be zoned any differently to the adjoining RNN land on the southern side of the Manarola Road ring road.
- 5.45 The proximity of the current Exemplar development to the KAC will no doubt create a strong synergy between the two areas once the KAC is developed and is functioning. The synergy between the KAC and the Exemplar land that is the focus of this Plan Change land is less obvious, particularly given the extent of residential development that is anticipated and provided for within the KAC itself.

- 5.46 For these reasons I reaffirm my opinion that the Exemplar is not required to be extended beyond Manarola Road and that the EO should be removed, and the underlying land revert to RNN zoning.

6 SUBMISSION

- 6.1 One opposing submission was received from the Waipuna Halswell - Hornby - Riccarton Community Board. The relief sought by the submission appears to support the status quo in terms of retaining the Exemplar Overlay and prefers future exemplar development within Halswell Commons to continue to be implemented via a non-complying resource consent pathway.
- 6.2 The Board states that the consent pathway is best placed to maintain a higher quality development as opposed to RNN zone rules.
- 6.3 The applicant met with the full Community Board via zoom to discuss the submission. With the submission having been made by subcommittee, several Board members not on the subcommittee enquired about various aspects of the Exemplar and the difficulties encountered to date.
- 6.4 Apart from expanding on the complications experienced through implementing the Exemplar via a non-complying consent pathway, the applicant also invited the Board to visit the Meadowlands development on Sparks Road to illustrate the speed and standard of development that could occur under an RNN framework.
- 6.5 The Chairperson had a query regarding the quality of maintenance of road reserve and recreation reserves within the Halswell Commons Exemplar, in the vicinity of her property. As alluded to in Mr Thompsons evidence, all road reserve and recreation reserve maintenance is now the responsibility of the Christchurch City Council. Previous high standards of maintenance that existed were funded by the developer and residents' association and this has discontinued and is now the responsibility of the Council.
- 6.6 A copy of the Meadowlands (RNN) design covenants was forwarded to the Board, and it was the applicant's hope that with a greater understanding of what the applicant (and Exemplar Residents) have endured to date their submission may be withdrawn.
- 6.7 Despite repeated attempts to follow up with the Board all communication ceased.

- 6.8 I do not agree with the Board's position that the status quo remains, and that the delivery of the Exemplar continued to be achieved via a non-complying resource consent pathway.
- 6.9 The framework for delivering housing within the EO of the North Halswell ODP has been convoluted, costly, slow and has not been capable of delivering housing at a time when demand for housing is the highest it has been for years.
- 6.10 The area in which it is proposed to remove the EO exhibits no characteristics that differentiate it from surrounding RNN areas and no tangible benefits to the community will accrue from continuing with the Exemplar beyond Manarola Road.

7 CONCLUSION

- 7.1 Based on my experience with the Exemplar I am in no doubt that the EO needs to be removed. In addition, I believe the existing RNN zone that lies beneath the EO is the appropriate zone to meet the future housing needs of those seeking to live within the North Halswell ODP.
- 7.2 Throughout my evidence I have illustrated the difficulties and complexities that have arisen when trying to deliver Exemplar outcomes via a series of alternative mechanisms. In my opinion there is no practical alternative available within the District Plan to deliver the Exemplar as it was originally intended.
- 7.3 RNN in its current form can provide for residential land at varying densities (above 15hh/ha) and the built form standards are capable of delivering variety in terms of typology including comprehensive developments.
- 7.4 The development of the plan change area under RNN will complement the existing Halswell Commons Exemplar development and will also compliment the density of future residential development located within the KAC.
- 7.5 Accordingly I am of the opinion that Plan Change 10 can be approved.



Mark Brown

27 April 2022.

ATTACHMENT ONE: EXEMPLAR AND PLAN CHANGE 10 AREAS