UNDER the Resource Management Act 1991

AND

IN THE MATTER of Private Plan Change RCP31 by Rolleston Industrial Developments Limited seeking to rezone

land adjoining Mill Road, Bradleys Road and Whites Road Ohoka.

STATEMENT OF EVIDENCE – FURTHER MATERIAL TO SUBMISSION by Grant Edge
BA, Dip LA FNZILA Registered

August 08, 2023

1.0 INTRODUCTION

- 1.1 My name is Grant Edge; I am a Fellow and Registered member of the New Zealand Institute of landscape Architects. I am a past Vice President of the institute.
- 1.2 I am principal of Edge Landscape Projects Limited and based at my home office in Fernside.
- 1.3 I have over 40 years' experience in Landscape Planning, Design and Management. I have been past member of Urban Design Panels for the Christchurch City Council, Nelson City Council and the Tasman District Council.
- 1.4 I am second term elected member of the Canterbury Regional Council, representing the North Canterbury constituency. I am a Council representative on the Greater Christchurch Partnership and understand some of the legislative and planning matters impacting on this application.

2.0 LOCAL KNOWLEDGE

- 2.1 I have lived in the district since 2006 nearby in Easterbrook Road on the north side of the Main Drain. Family members previously lived in a small cottage at the corner of Mill Road and Bradleys Road and consequently I am very familiar with this community and the proposed subdivision site.
- 2.2 I am a former community member of the Waimakariri District Council's Water Zone Committee (2010-2019), and current member of the Waimakariri Central Rural Drainage Group.

3.0 SCOPE OF FURTHER MATERIAL

- 3.1 In this further material:
 - I will **introduce** key findings from my 2004 report referred to as a reference in my submission entitled *The Ohoka Landscape* Assessment for Waimakariri District Council and the Ohoka Community Trust. I'll present some slides and give an opinion in terms of context as to Landscape Character and why in my opinion the landuse and housing typology proposed in this application is inappropriate and should be reconsidered.
 - I will **elaborate** a bit more on the changes to landscape character that can come about through settlement dispersal.
 - I will **provide** a short overview of issues raised in my submission.
- 3.2 **The intent** of this further material is simply to acknowledge the views of the community and provide commentary on what I see as the key changes to the physical and visual landscape that may occur if this proposal or any proposal like it proceeds.

4.0 OHOKA LANDSCAPE ASSESSMENT 2004 and PRESENTATION

- 4.1 I have provided Commissioners with an A4 extract from the original A3 report for your background information. The report was presented at a public meeting in Ohoka 2005. The full report describes objectives, methodology, commentary on landscape character of roads, general landscape typology and provides observations about the future, design matters, community aspirations and made some recommendations.
- 4.2 This landscape character assessment was seen as being necessary to provide the community with a reference point to which it could begin to gauge the effects of continuing subdivision development within the Ohoka area.
- 4.3 In parallel to this assessment, Council also prepared a Community Survey (published in 2006) to assess how residents viewed their area in a document entitled, *Small Holding Owners Survey*. These findings in my view supported the concerns identified by the community in 2004 and are similarly reflective of the community concerns expressed about the application that you are considering today.
- 4.4 Although there has been some in-fill development in the assessment area over the last 20 years, in my opinion none have impacted on the local landscape and community as much as the scale that this proposal is likely to.

SLIDE 1 The Study Area

SLIDE 2 Objectives

SLIDE 3 Methodology

SLIDE 4 Roading

SLIDE 5 Waterways and Drainage

SLIDE 6 Landscape Character Area

SLIDE 7 Area A Ohoka Village

SLIDE 8 Area B Heritage Landscape

SLIDE 9 Area C Mill/Ohoka Stream

SLIDE 10 Area D 'Lifestyle' Subdivision Landscape

SLIDE 11 Area E Rural, Agricultural Landscape

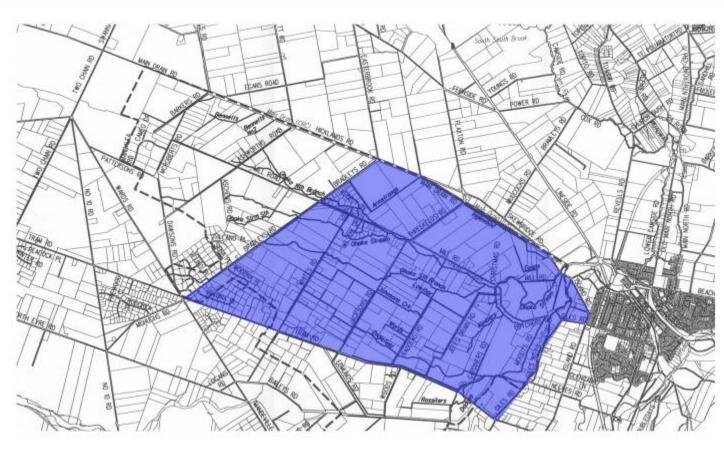
SLIDE 12 Area F Subdivision Landscape

SLIDE 13 Community survey

SLIDE 14Landscape Character Areas

The main takeaway from the study, was recognition of the diversity of residential living typologies throughout the Ohoka area. Each area had some key physical attributes that provided the basis for identification of landscape character. The spatial dispersal of subdivision typology was also reflected through such things as the maturity of vegetation, with the older housing stock retaining trees of stature and new lots containing younger trees in transition from rural farmland to 'lifestyle' typologies. The WDC 2006 survey identified reasons why people moved here. Reasons included space for animals, space for children, distance from neighbours, having a garden, a sense of community, clean air, views and a quieter environment and investment. One could say that these are living attributes not easily found in a more compacted urban setting.

The Study Area



OHOKA LANDSCAPE ASSESSMENT

LANDSCAPE STUDY BOUNDARY











Revision Nº.

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Objectives

Objective 1

To describe and assess the landscape elements that contribute to the visual character of the Ohoka Landscape.

Objective 2

To identify and describe any distinctive landscape character types that may exist within the area

Objective 3

To identify the 'effects that continued subdivision may have on the identified character types

Objective 4 (Next Stage)

Provide guidance to council and the community as to how they can best manage change to retain those most valued elements that contribute to the quality of the Ohoka landscape character

Methodology

- Landscape Description
 - We identified key landscape elements:
 - Natural Systems
 - Topography
 - Catchment/Hydrology
 - Vegetation
 - Cultural Influences
 - Roading Pattern
 - Landuse
 - Built Environment
 - Vegetation
 - Services

Roading

- Road Hierarchy System
- Roading patterns
- Variable treatment of berms
- Drainage requirements
- Tree planting
- Variable maintenance of berms









Waterways/Drainage



Localised Flooding Area Natural Watercourses

The natural watercourses within the Ohoka landscape, create an irregular pattern over the landscape. The flowing forms of the streams and creeks create a softer, natural character compared to the linear paddocks and road layout. The natural watercourse character is enhanced when vegetation is growing along the waters edge.



Public Drains

The network of public drains creates a strong pattern over the landscape. They follow the grid layout of the paddocks and road layout.



Ohoka Stream (off Butchers Rd)



Ohoka Stream (off Mill Rd)



Public Drain (Jacksons Rd)



Public Drain (Mill Rd)

Project Title

OHOKA LANDSCAPE ASSESSMENT

Drawing Title

LANDSCAPE - NATURAL SYSTEMS











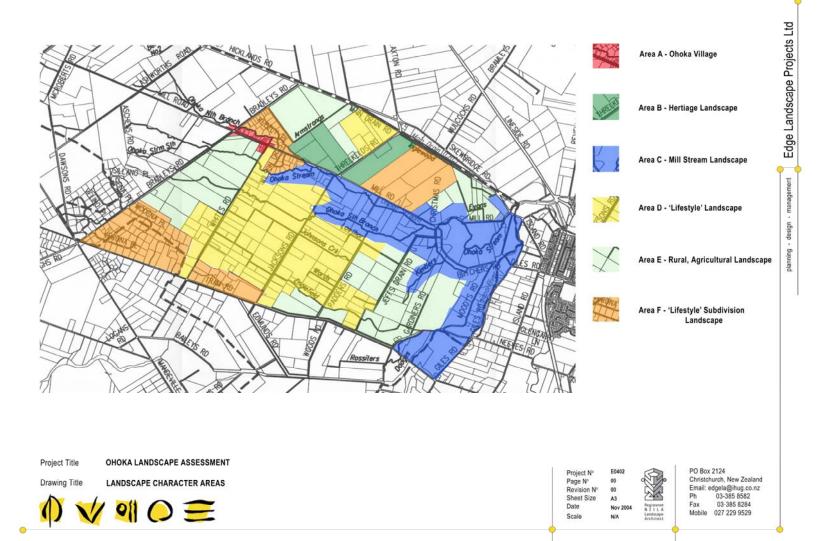
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Landscape Character Areas



Area A: Ohoka Village

- Smaller sections, older dwellings, church, service station, halls, public open space, industrial activity.
- urban style fencing for properties paling and steel fences
- domestic scale planting in smaller gardens.
- street lights and some signage.







Area B: Heritage Landscape

- large house setback from the road
- large mature trees placed casually in groups between the road and the house.
- The scale of the Homestead space.
- The combination of mature trees and low hedges along the fencelines.
- Simple fences and gates. Working with timber and material easily available at the time.







Area C: Mill Stream Landscape

- The natural waterway
- The meandering narrower roads
- Mature trees following the streams
- Properties set back from the road surrounded by mature deciduous trees.
- Creation of an 'English style' woodland landscape







Area D: 'Lifestyle' Subdivision Landscape

- Large single dwelling (single or double storey)
- Ancillary Buildings (garages, Farm sheds, glass houses)
- Amenity planting around the house (large scale trees, extensive lawns)
- Entry gateways with long Driveways
- Paddock spaces for grazing sheep, horses defined by various types of fencing
- Landscape features such as ponds
- Hedges and fences to define their space and provide privacy.







Area E: Rural, Agricultural Landscape

- Sheep and Dairy Farming
- Spacious Open Landscapes
- Dynamic working places (Farm Activity, Livestock)
- Clusters of trees and Hedgerows defining paddocks
- Irrigation systems
- Clearly distinguishable patterns







Area F: Subdivision Landscape

- Similar to Lifestyle Landscapes
- Horticultural setting (Olives, Oaks, Chestnuts, Walnuts)
- Large gardens
- 'Designed' Public landscapes
- Uniformity between individual lots
- Each subdivision has its own character



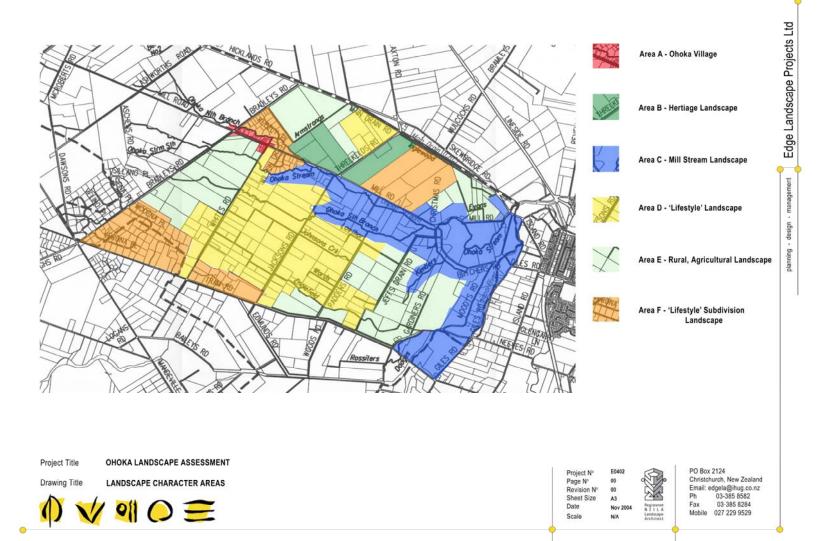




Community Survey

- Valued Attributes
- 'Rural' character main reason to live in Ohoka
- Lifestyle
- Trees, Views
- Spaciousness
- Quietness
- Concerns
- Roads and roadsides
- Subdivision development
- Retention of landscape character

Landscape Character Areas



5.0 KEY POINTS OF MY SUBMISSION

5.1 **LEGISLATION**

I've listed some inter-related legislation that in my view is relevant to consideration of this application.

I've just outlined some key concerns that this application seems to challenge. I have unfortunately not been able to elaborate on each of these. However, I'm sure the panel will be aware of the issues and that others will address these in more detail.

5.2 I've referred to the Resource Management Act Section 7(c) Other Matters.

My submission and further material is related specifically to addressing matters concerning:

- (c) The maintenance and enhancement of amenity values.
- (e) Recognition and protection of the heritage values of sites, buildings, places or areas.
- (f) Maintenance and enhancement of the quality of the environment.

6.0 LANDSCAPE CHARACTER

- 6.1 I have not undertaken a full landscape analysis of this application, but instead provided commentary related to my 2004 study. I have not applied my usual rigour in assessing the evidence of other consultants and am giving opinion based on experience and local knowledge.
 - The proposal will lead to an increased urban form with associated urban elements that would significantly change the amenity values experienced by the community in the context of its existing peri-urban/rural character environment. In doing so, it may affect the wellbeing of the community, be contrary to the reasons why they decided to live in Ohoka and impact on the quality of the rural environment they were expecting to experience.
 - The proposed scale and intensification of housing (approx. 845 Residential 3) and the resulting smaller land parcels (min 500m2) will be out of character and significantly contrast with the predominant existing housing typologies located in larger land parcels (2500m2 to 4ha) and will also be much smaller than the lots in the core of the heritage village (averaging 1000m2 to 7500m2).
 - The proposal impinges on the heritage character of the core historic settlement and surrounding environment. I am particularly concerned about the identification of business activity and road egress on to Mill Road opposite key heritage buildings. My understanding is that the area began to develop in the 1860's with the first township sections on the north side of Mill Road from Whites Road to Bradleys Road selling from 1875. The Anglican church in 1886. The Railway line ran on the southside from Kaiapoi to West Eyreton with the railway station located opposite the church. I would like to see better recognition and protection of the heritage elements in the design to avoid any diminishing of their importance to the community.

7.0 THE PROPOSAL

- 7.1 The Outline Development Plan does not provide certainty for the community, nor sufficiently describes the likely physical change that will impact on rural amenity.
- 7.2 The memo from Mr Willis in response to panel Minute 2 looks like some progress has been made in resolving issues. However matters related to character and amenity remain unresolved and in contention. Assuming further work will be required I think that a meetings of minds to address heritage and landscape integration along with community representatives providing a significant input would no doubt arrive at some consensus.
- 7.3 This site is effectively transformed to become a 'suburban style' enclave and small town. The S42A report suggests the 'town' created will grow from a population of 288 to nearly 2500, which will be larger than the population of Oxford at 2200.

8.0 S42A

8.1 I have read the section 42A Character, Amenity and Landscape Matters P28-31

8.2 **Section 6**

- **6.9.1** Given the references described in this section including those of a significant number of submitters and the opinion of the expert evidence of Mr Nicholson, I find it difficult to understand the conclusion made in the S32 report as referred to by Mr Willis, that the effects on Character, Amenity and landscape...in terms of broader amenity values are minor.
- 8.3 Unfortunately, I note that both Mr Willis and Mr Nicholson haven't referenced my submission.
- 8.4 I agree with the submission of Jackson & Breen (591), the submission of the Waimakariri District Council (216) as well as those numerous people identified in 6.9.2.
- I generally agree with Mr Nicholson's assessment in his evidence. However, given that the scale of change will be significant, and in my opinion that the proposed mitigation is unclear, I don't agree with his assessment using the New Zealand Institute of Landscape Architects Guideline (p15), that the effects will be moderate to high. In my opinion the resulting effects will be totally transformative and change the village character and surrounding landscape amenity for ever and therefore the effects in this context would be more likely to be high.
- 8.6 Mr Nicholson mentions (13.6) consideration of a balance between landscape and amenity issues and the positive effects outlined in the National Policy Statement Urban Development (NPS-UD 2020) to provide increased housing. However, the recent Great Christchurch Partnership Housing Capacity Assessment 2023 suggests that housing capacity in Waimakariri in the short, medium and long term, (based on current planned priority urban growth areas identified in Chapter 6 of the Regional Policy Statement), would in fact have a surplus capacity.

9.0 CONCLUSION

- 9.1 My submission addresses other matters related to the Outline Development Plan design such as effects on multiple road crossings over natural overland waterways, stormwater disposal and down-stream effects and the traffic egress onto Mill Road.
- 9.2 The indicative Master Plan approach included in the Urban Design Statement provided by a+urban and Nicole Lauenstein would provide more certainty for the community. The alternative proposal she provided was more generous with open space and waterway integration within the site, albeit undeveloped in terms of more generous boundary treatment.
- 9.3 The core historic elements within the Ohoka Village need protection and more attention. We have to remember that this business development is proposed to take place opposite an existing largely quite residential environment.
- 9.4 In my opinion the land use activity and housing typology proposed in this application will have significant effect on the wellbeing of this community and its impact on the existing landscape will be negatively transformative of its rural and heritage characteristics.
- 9.5 I refer you to the decisions made in Plan change P017 in which the hearing commissioners adopted a cautious approach to their determination, especially with respect to matters related to policies about character and amenity, and the need to ensure that stormwater management and flood risk is properly managed.
- 9.6 I also refer you to clause 4.9 in Mr Nicholson's evidence outlining Policy 18.1.1.9 of the operative District Plan which identifies key matters to be considered with respect to any growth and development in Ohoka.
- 9.7 Although I have indicated opposition to this particular proposal in my submission, I am also seeking relief on several matters that I think needed to be considered further in order to achieve a significantly more appropriate outcome.

Grant Edge Landscape Architect



Ohoka Landscape Assessment

Prepared for Waimakariri District Council and the Ohoka Community Trust
November 2004

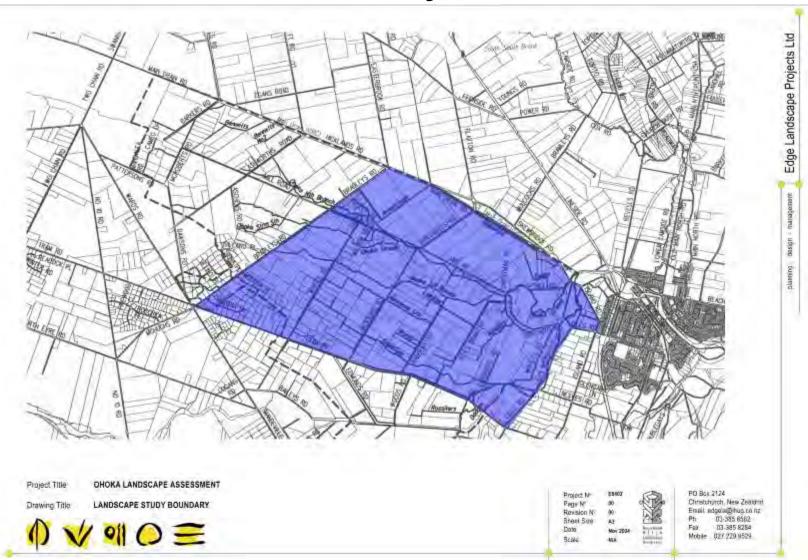








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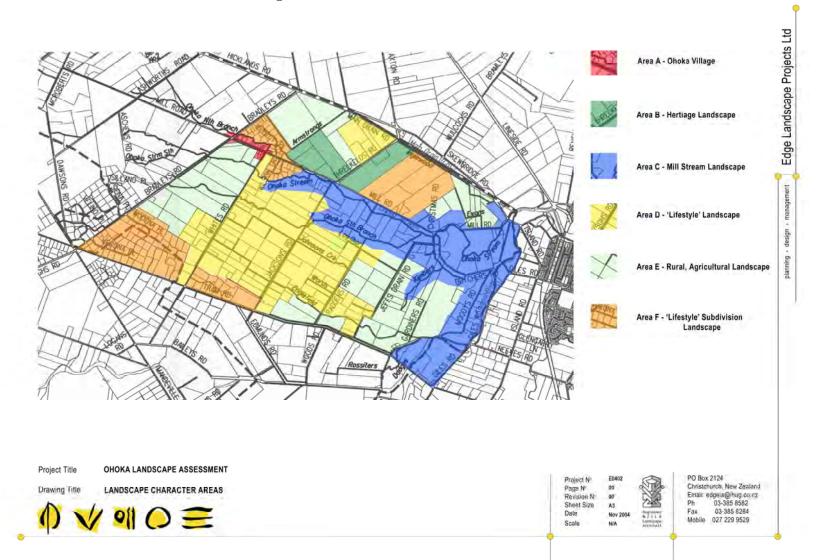


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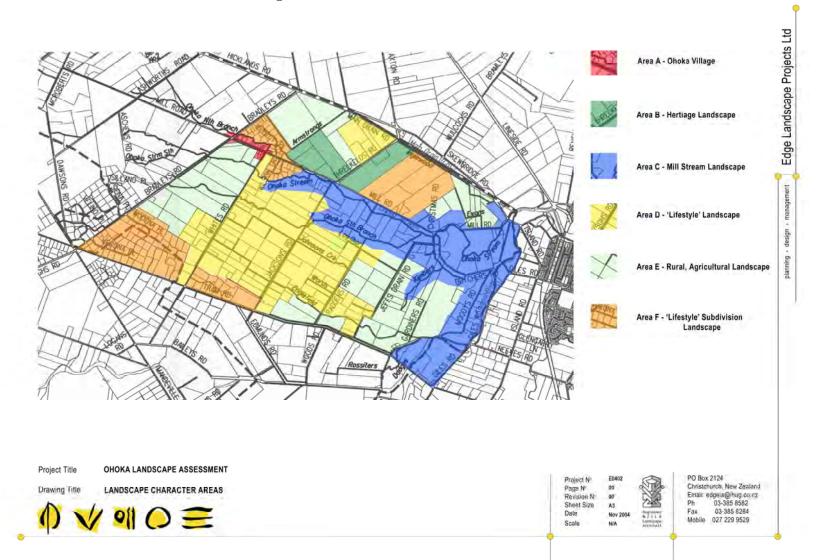




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Landscape Character Areas



August 12, 2022

District Planner Waimakariri District Council

Private Plan Change RCP031
Rolleston Industrial Developments Limited
Land Boundaries – Whites, Mill and Bradleys Roads Ohoka

SUBMISSION BY GRANT EDGE

The following notes support the Form 5

After reviewing relevant parts of the application, I advise that I **OPPOSE** the proposed application to rezone this land from Rural to a Residential 3, Residential 4A, Residential 8 and Business 4 as detailed in Attachment 3 and the outline development plan shown in Attachment 4 in its entirety.

I consider this application to be an inappropriate response to urban growth at a time of global climate change crisis with international agreements requiring us to reduce carbon emissions. This suburban style housing typology creates an isolated high-density settlement in a rural location. The subdivision is distant from the main urban hubs of Rangiora and Kaiapoi and in my opinion is out of step with New Zealand's drive for compact urban intensification and transport and infrastructure efficiency.

I am concerned that this proposal is contrary to the intent, policies and objectives of a number of existing central and local government planning initiatives which aim to discourage unplanned urban sprawl in greenfield sites.

These include:

Resource Management Act

National Policy Statement – Urban Development 2020

The RMA (Enabling Housing Supply and other matters) Amendment Bill.

Hi Kina te Kohupara Kia mauri ora ai te iwi Transport Emissions; pathways to net zero by 2050

Climate Change Response (Zero Carbon) Amendment Act 2019

The Emissions Reduction Plan

The Waimakariri District Council's Operative District Plan

The Waimakariri District Council's Proposed District Plan.

The Canterbury Regional Council's - Regional Policy Statement

The National Policy Statement Freshwater Management

Among others

Reference also to:

The Ohoka Landscape Assessment for WDC– Edge Landscape Projects Ltd 2004 The Private Plan Change PO17 Re-zoning Mill Rd 2012

The WDC Small Holding Owners Survey 2006

The WDC Residential 4A Zone Household Survey 2007

PARTICULAR ISSUES

Resource Management Act

Section 7(c)

- The maintenance and enhancement of amenity values
- Recognition and protection of the heritage values of sites, buildings, places or areas
- Maintenance and enhancement of the quality of the environment.



<u>National Policy Statement – Urban Development 2020</u>

- Objectives and Policies not met
- Policy 8 not met
- Greater Christchurch Housing and Business Development Capacity Assessment –Sufficient Surplus
- Intensification goals not met
- It is unfortunate that this proposal is being mooted outside the agreed planning process and is being sought through Policy 8 provision which in effect seems to undermine the NPS UD intent.

The RMA (Enabling Housing Supply and other matters) Amendment Bill

- Qualifying matters: Heritage area, natural hazards, Airport Noise Contour proximity under review.
- Inappropriate development
- Transport Infrastructure
- Infrastructure Network deficiencies

<u>Hi Kina te Kohupara Kia mauri ora ai te iwi – Transport Emissions: pathways to net zero by 2050</u> <u>Climate Change Response (Zero Carbon) Amendment Act 2019</u>

- Transport system not connected to public transport
- Emissions
- Mode Shift

The Emissions Reduction Plan

Designed to reduce light vehicle - Vehicle Kilometers Travelled by 20% by 2035

The Waimakariri District Council's Operative District Plan

The Waimakariri District Council's Proposed District Plan.

- Contrary to current and proposed urban growth areas
- Contrary to protection of heritage values Ohoka Village
- Among other matters

Greater Christchurch Partnership Settlement Pattern - Our Space 2018-2048

Agreed Growth Strategy

The Canterbury Regional Council's - Regional Policy Statement

- Chapter 5 Landuse and infrastructure
- Chapter 6 Development of Greater Christchurch
- Chapter 7 Freshwater
- Chapter 9 Ecosystems and indigenous Biodiversity
- Chapter 10 Beds of Rivers and lakes and their riparian zones.
- Chapter 11 Natural Hazards
- Chapter 12 Landscape
- Chapter 15 Soils

The National Policy Statement Freshwater Management

- Hierarchy of obligations
- Te Mana o te wai
- Whole of Catchment

It is my intention to review the above documents in more depth and to comment on relevant parts in my hearing submission.

KEY ISSUES - LANDSCAPE CHARACTER - with reference to the ODP

Consultation

Applicant's failure to engage in meaningful discussion with the local community.

Inappropriate Zoning

- increases urban character within a rural context.
- Out of context to the surrounding Ohoka low density small holding development.
- Impinges on character of the historic core settlement
- Density is too high

Use of an ODP tool to apply for this rezoning

- <u>Seek</u> further specific information as a 'Master Plan' with typical cross-section proposals for: housing typology, roads, waterways, footpaths, cycleways and structural planting.
- <u>Seek</u> commentary on design criteria which are seen as being critical to being able to absorb development successfully within the rural landscape context. A high degree of sensitivity will be required.

This ODP does not respond well to the existing landscape features on the site or consider the heritage values of the core settlement and surrounds.

Loss of Rural character

- Fails to assess the effects of loss of rural character anticipated for those living on existing adjacent lifestyle properties within the Ohoka environment.
- Contrary to the views expressed in the Waimakariri District Council's Small Holding Survey 2006 and the Rural Residential Household Survey 2006 regarding living in a rural environment.
- Lack of consideration of the cumulative effects of development on rural land and natural hazards (flooding) rivers .
- Contrary to Policy 14.1 14 with respect to anticipated lifestyle and rural character. Inability for this proposal to achieve this policy.
- The proposal will overwhelm the rural/lifestyle character of the broader Ohoka landscape and the heritage qualities of the village.
- Fails to address Policy 18.1.1.9 to maintain the character of the Ohoka village core.

Loss of Productive Farmland

<u>Seek</u> Clarification with respect to the CRPS and the Regional Land & Water Plan

Waterways and Stormwater

- Lack of information regarding the effects of stormwater run-off for the whole of the sub-catchment.
- Lack of information regarding the effects of stormwater runoff from the subdivision and any mitigation measures to be provided. Specifically, issues related to provision of catchment management planning.
- Fails to consider downstream effects of any likely increase in stormwater run-off and flooding.
- The proposed alignment and plans indicate that it is proposed to restrict the water course to a more defined channel. No details are provided.
- Given the flooding and heavy rainfall events over the last few years and increasing intensity of rainfall events it is evident that the current river system cannot cope with increased run off.

- The proposal needs to assess any cumulative effects of any anticipated changes to residential or rural development upstream of the development.
- <u>Seek</u> to design the water course and flood plain pathway to be wholly within the public realm to avoid inappropriate canalization of the watercourse and allow for longer term maintenance by the Council.
- Seek more detailed information about stormwater management and flooding issues.
- Seek creation of large stormwater retention basin biodiversity, open space recreation
- Seek no piped stormwater discharge directly into any of the three existing streams.
- Oppose any direct discharge of surface water to groundwater through engineered stormwater retention basins other than seepage from constructed wetland storage.
- Maintain or reinstate the natural sinuous character of the rivers.
- Oppose river diversion.

Traffic

- Increased traffic on Mill Road, Whites Road and Bramleys Road will diminish the ambiance of a quieter rural environment anticipated by existing residents surrounding the proposed subdivision.
- Internal layouts of roads are too close to the natural water course in full flood. Engineering solutions to retain such roads would be a burden on ratepayers.
- Seek further distance away from current floodplain.
- Seek Removal of the Internal central road
- Seek No access onto Mill Road
- Seek no vehicular bridges across the existing rivers
- Insufficient facilities both within the subdivision and on surrounding roads to facilitate amenity for cyclists and walking. <u>Seek</u> a more efficient layout.
- Some proposed pedestrian/cycleway linkages are contrary to CPTED (Crime Prevention Through Environmental Design) principals. Insufficient widths and long narrow linkages are inappropriate. <u>Seek improved facility and connections</u>.
- The internal circulation routes for pedestrians and cyclists are not entirely conducive to facilitating easy off -road access to the village core.
- Seek formal footpath along Mill Road and Whites Road if agreed with community.
- Seek upgrade of footpaths and pedestrian linkages to schools, Ohoka, Rangiora and Mandeville.

Reserves and Public Open Space

- The proposal fails to take advantage of an opportunity to integrate stormwater management, public open space and transport connectivity as a comprehensive and sustainable solution to addressing the problems of this site.
- Seek alternative design proposal to create an improved integrated catchment proposal.

ALTERNATIVE PROPOSALS

If the commissioners are of the opinion that some development should occur, then alternative development options need to be considered in liaison with the community.

Key considerations

<u>Spatial configuration</u>

land parcels between the three rivers.

Housing typologies decreasing in intensity at distance from core village

Built design controls with heritage referencing.

Medium density cluster

Rivers and drainage

Spring head protection

Hazard management to consider upstream and downstream effects.

Natural character values of the rivers.

Stormwater capacity design for 1;500 events

No piped discharge directly to rivers

Discharge to constructed wetland retention basins, biodiversity and open space.

Roads and Access

No internal road through the centre Access to spatial units of Bradley's and Whites Road only No access onto Mill Road

Business

Reduce scale and design parameters Higher standards of amenity.

SPECIFIC COMMENTS ON CONSULTANT REPORTS

APPENDIX E

LANDSCAPE ASSESSMENT

The explanation of the methodology is in keeping with standard practice guidelines for visual assessment.

Note;

Existing Site Character - A few comments that don't seem to be correct.

Reference to surrounding dwellings as being Rural Residential is not correct.

These are dwellings within Rural small holdings often 4ha in size.

The proposed site is not on the outskirts of rural 'suburban' development.

The Ohoka Streams feed into the top of the Kaiapoi River at the confluence of the Cust Main Drain and the Silverstream river.

The Ohoka Stream through the domain has been revegetated by the local village community over several years.

There is generally a lack of detail and description of intent in the anticipated outcomes for landscape treatments and plantings proposed throughout the site.

The proposed setbacks of 10m and space available for the naturalization of the streams and any storm events is inadequate.

No information about design for retention basins or springhead setbacks.

Seek more information and detail.

In the conclusions - Seek clarification as to what 'mitigation measures' are anticipated that would 'retain the village -like character'.

Village Amenity

The report indicates that 1.5km visual context is being considered.

However, I refer to my 2004 Visual Assessment of the Ohoka landscape. The community consider their landscape and physical boundaries to be more extensive. In effect one needs to consider context from Tram Road to the south, Bradleys Road and to the west, North to the Cust Main Drain and east to Giles Road. In the context of that area, many more heritage elements are considered including heritage buildings, features, mature tree plants, hedge rows and other features. These are the attributes which combine to make up the Ohoka landscape. In my opinion this landscape has a variety of landscape character typologies and the proposed develop site has for a long time been considered as having 'rural' character.

Change has occurred overtime and been absorbed into the spatial context of the area. The proposed development is of a scale and typology not previously envisaged by this community.

I am not convinced by the description of the 'Visual Sensitivity Receptor' in table 2 nor the description of the proposed 'Mitigation Measures'. Visual references are not provided to help inform reasoning.

The road landscape treatment is especially of concern.

The concluding remarks suggest that the change will be of 'an acceptable magnitude on the existing rural landscape character and values'. That is a contradiction when I consider the change from open Rural character to intensified built environment of a predominantly urban or peri-urban character.

APPENDIX F

URBAN DESIGN ASSESSMENT

I acknowledge the description of the historic and progressive changes to the landscape character over many years through successive plan changes that have resulted in low-density development.

The report covers some of the material described in the Landscape Architects report but paints a more descriptive picture and clearly identifies relationships with associated features and opportunities for connections and view shafts.

Master Plan

I am much more confident in the intent of the proposal as shown in Fig 4.4 than I am with the ODP which I have rejected.

This indicative proposal shows an understanding of the need to address the most prominent landscape features of the waterways that runs through the site. These waterways are fed from natural springheads, overland flows from the adjacent rural environment as well as via redirected roadside drainage channels from some distance away near Mandeville. The water passing through the site in significant rainfall events is considerable. The downstream flooding effects have in the past been significant.

I would like clarification of the housing typology indicated for the various land parcels shown in the indicative Master Plan. I certainly support a more sinuous internal road layout, although lengthy bridges could be problematic. I do not support the extension of access from the subdivision onto Mill Road.

<u>Seek</u>: Development of a Master Plan with community consultation to replace the ODP to provide development certainty to the community.

With respect to issues mentioned earlier related to National Policy Statements, I consider that transport and emissions reduction issues are still unlikely to be resolved under a *Master Plan* approach unless the subdivision proposal is significantly altered.

INFRASTRUCTURE

Other issues of note:

Potable Water Supply

In my opinion the applicant may need to investigate the recent High Court decision on the AWA consents where a water take consent cannot necessarily be tied to an existing use. The report indicated a suggestion of transfer under PC7 rules. That may not now be the case.

High Voltage Wires

I am unclear about any requirements in the proposed subdivision for housing offsets from the centerline of the High Voltage electricity lines for Public Health reasons and the implications for any proposed development in the vicinity.

TIME CONSTRAINTS AND FURTHER SUBMISSION INFORMATION

Unfortunately, time constraints have not allowed me to consider all the matters raised in any detail. However, I will make other relevant comments at the hearing.

Overall, though, I consider intensification of this site on the scale proposed is inappropriate and oppose it.

WISH TO BE HEARD

I advise that I wish to be heard with respect to this submission.

Yours sincerely EDGE LANDSCAPE PROJECTS LIMITED

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