

Before the Independent Commissioners appointed by the Waimakariri District Council

In the matter of Proposed Waimakariri District Plan: Ohoka Rezoning
(Hearing Stream 12D)

and

In the matter of Further submission by the Oxford Ohoka Community Board
[submitter 62] to the Rolleston Industrial Developments
Limited [submitter 160] and Carter Group Property Ltd
[submitter 237] submission to Rezone land at Ohoka

Brief of evidence of Richard John Knott on behalf of Oxford-Ōhoka Community Board – Urban Design.

Dated: 12th June 2024

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Evidence of Richard John Knott:

Introduction

1. My full name is name is Richard John Knott. I am an urban designer, masterplanner, historic heritage specialist and planner and work in my own company: Richard Knott Limited.
2. I have been engaged by the Oxford Community Board to prepare this statement of evidence in relation to the submissions by Rolleston Industrial Developments Ltd (submission 160) and Carter Group Property Ltd (submission 237) to the Proposed Waimakariri District Plan (PDP). These submissions relate to the zoning of land at Ohoka to a range of zones, including General Residential Zone, with additional submissions that the residential component of the land land should be zoned MDRZ.
3. I visited Ōhoka on the 26 June 2023 and 9th August 2023.

Experience and Qualifications

4. I have around 35 years' experience working in the areas of urban design, heritage and planning.
5. I hold the following qualifications:
 - 5.1. Master of Arts in Urban Design - University of the West of England, UK (1995).
 - 5.2. Post-Graduate Diploma in Building Conservation - Bournemouth University, UK (2002)
 - 5.3. Bachelor of Planning - Victoria University of Manchester, UK (1989)
 - 5.4. Bachelor of Arts in Town and Country Planning - Victoria University of Manchester, UK (1988)
6. My extended work to complete my MA (urban design) included the development of a methodology for the assessment of the character of towns.
7. I have been elected as a full member of the following professional institutes:
 - 7.1. Member New Zealand Planning Institute

- 7.2. Chartered Town Planner (Member of the Royal Town Planning Institute, UK)
- 7.3. Member Institute of Historic Building Conservation (UK)
- 7.4. Member Institute of Highway Engineers (UK)
8. I am a Making Good Decisions Certificate Holder with Chairing Endorsement. I was first appointed as an Independent Planning Commissioner for Auckland Council in 2011. I have subsequently sat on around 60 hearings, as chair, sole commissioner and panel member, for Hamilton City Council, Whangarei District Council, Taupo District Council, Tauranga City Council, South Wairarapa District Council and Auckland Council. I often sit on Hearings Panels where specialist urban design, special character or heritage expertise is required.
9. I was a panel member for the Tauranga IPI hearing (PC33, Enabling Housing Supply) and am a current panel member of the Auckland IPI hearings (PC78, Intensification), and associated plan changes PC79, PC80, PC81, PC82 and PC83.
10. I undertook the Planning Institute of Australia training in Landscape and Visual Assessments in 2018, and have subsequently prepared landscape and visual assessments for private clients.
11. My work has included designing and leading a wide range of projects, including masterplans/development frameworks for existing urban sites and greenfield areas through to providing advice for individual owners on their proposals to make alterations to their individual heritage home. These projects include:
 - 11.1. Lead Masterplanner for the Taumarunui | Manunui Spatial Plan – Ruapehu District Council (with Ree Anderson Consulting)
 - 11.2. Lead Masterplanner for Featherston Masterplan Plan – South Wairarapa District Council (with Ree Anderson Consulting)
 - 11.3. Designing and authoring a Framework for Action, a masterplan for the Papakura Metropolitan Centre – Papakura Local Board
 - 11.4. Designing and authoring a masterplan for Ōpōtiki Town Centre – Ōpōtiki District Council

- 11.5. Designed and authoring a strategy for regeneration and development in Manurewa town centre – Manurewa Local Board
- 11.6. Designed and authored The Lakes Masterplan for a large greenfield area in Foxton Beach – Horowhenua District Council (not yet published)
- 11.7. With Kim Goodfellow, designing and authoring a masterplan for Ōpōtiki Harbour and Wharf – Ōpōtiki District Council (with The Goodfellow Group)
- 11.8. Urban designer for a number of greenfield and brownfield residential, commercial, mixed use and supermarket/local centre developments across New Zealand.

Involvement in the PDP

12. I was previously asked by WDC to assist with their submission to PC31 in July 2022. I initially provided my written comments which informed the Council's submission and later prepared and presented evidence on their behalf at the hearing in August 2023.
13. I have subsequently been asked by the Oxford Community Board to prepare evidence responding to Submissions 160 and 237 to the PDP.

Code of conduct

14. I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving evidence. Except where I state that I am relying on the evidence of another person, this written 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 expressed in this evidence.

Scope of evidence

15. My evidence will address the following:
 - 15.1. Evidence of Mr Nicholson
 - 15.2. Urban design, landscape and visual evidence on behalf of the Applicant
 - 15.3. The existing character of the area

- 15.4. Whether there are fundamental flaws with the existing village
- 15.5. The impact of additional development anticipated by the PDP
- 15.6. Whether the area is a natural extension to Ōhoka

Summary of evidence

16. Having considered the evidence of Mr Nicholson and the evidence of the applicant's urban design, landscape and visual experts, I have found that:
 - 16.1. I accept and support the evidence of Mr Nicholson, and in particular that the proposed rezoned land would not contribute to a consolidated urban form for Ōhoka, but rather would create a 'peninsula' of urban land extending south from the existing township surrounded on three sides by rural and rural residential land.
 - 16.2. I consider that the lasting impression of the character of Ōhoka is of residential, commercial and community developments on generous lots fronting Mill Road, within a wider area developed for lifestyle development. The development which would be delivered were the land rezoned is entirely at odds with this existing character of Ōhoka.
 - 16.3. The shortcomings in the existing settlement identified by Ms Laurensen are only relevant if the settlement is considered with 'urban eyes'. These are features of the area that likely encouraged many of the existing residents to live there; they are features which are typical of similar lifestyle areas around all of New Zealand's cities. They are popular as they offer an alternative to urban living.
 - 16.4. The impact of the proposed rezoning on open rural views and the amenity of the areas would be far greater than allowable by the RLZ zoning proposed in the PDP, there would likely be around 50 dwellings in place of each dwelling allowable under the PDP, with views of a sea of roofs, fences, large intersections and the general significant additional activity associated with around 2100 new residents (recognising the existing population is under 300).

- 16.5. The additional land will not augment the existing Ōhoka but will create an entirely new place of which the existing becomes a small part.

Evidence of Mr Nicholson

17. In general, I accept and support the evidence of Mr Nicholson. In particular I agree that the rezoning of the land will:
 - 17.1. Not contribute to a consolidated urban form for Ohoka.
 - 17.2. While there is a positive level of internal connectivity shown within the ODP, this is undermined by the site's isolated location and the lack of pedestrian, cycle and public transport connections on the rural roads connecting the site to existing town centres and the wider district.
 - 17.3. The proposed re-zoning does not contribute to a well functioning urban environment as defined by Policy 1 of the NPS-UD, and in particular does not have good accessibility between housing, jobs and community services, by way of public or active transport.
 - 17.4. The wider Ōhoka / Mandeville 'conurbation' would not contribute to a well-functioning urban environment. In particular, it would not have good access to jobs or community services, and travel is likely to be car dependent which would not support reductions in green-house gases.
 - 17.5. There would be a loss of rural character and outlook as a result of the increased geographic and social scale, increased traffic, suburban densities and built form.
18. Mr Nicholson also sets out a useful summary of the strategic directions relevant to the submissions; in particular he references the National Policy Statement on Urban Development (NPSUD), the Canterbury Regional Policy Statement (CRPS) and the Proposed Waimakariri District Plan (PDP).
19. He notes that Objective SD-02 of the PDP amongst other matters, seeks urban development and infrastructure that is consolidated and integrated with the urban environment, and recognises existing character and amenity values. It seeks to focus new residential activity within existing towns or identified development areas within Rangiora

and Kaiapoi, and supports a hierarchy of urban centres with Rangiora, Kaiapoi, Oxford and Woodend being the focus for residential development and intensification.

20. I accept and support his analysis as to whether the land would be consolidated with the existing village. I consider that his Figure 2 very clearly illustrates that the proposed rezoned land would not be consolidated with the existing settlement.
21. I support his conclusion that *'6.15 In my opinion the rezoning request would not contribute to a consolidated urban form for Ōhoka, but rather would create a 'peninsula' of urban land extending south from the existing township surrounded on three sides by rural and rural residential land.'*

Urban design, landscape and visual evidence on behalf of the Applicant

22. The applicant has assembled a very experienced, well-respected team who together have brought together a well thought through urban layout for the plan change area, illustrated on the *'Ōhoka Illustrative Masterplan'*¹ and *'A. Elevated perspective view from north-west over the whole site'*.²
23. I recognise that the hearing is a proposed district plan hearing, and the illustrative masterplan and other illustrative material is provided to provide an example of the form of development that the PDP could deliver. This information provides a clear basis for me to make informed comment upon the submissions.
24. I do not therefore intend to focus on the detailed street pattern or urban layout illustrated in the evidence of the Submitters experts as such, but will refer to overarching features of the masterplan layout to illustrate my overall concern that accepting the submissions would deliver a new urban development which does not reflect the character or form of the existing Ōhoka area, on land which is not identified for such development and out of step with the expectations of the CRPS.
25. I note that you have heard evidence regarding the meaning of Urban Environment in other PDP hearings, and that this has been the subject of expert conferencing. I therefore do not intend to address this matter in detail, but note that in my evidence for the PC31 hearing I indicated

¹ Evidence of Mr Falconer – page 11 of attached Design Report

² Evidence of Mr Compton-Moen – Appendix One - Landscape and Visual Impact Assessment Figures page 2

that it was my view that as Clause (a) of the NPS-UD definition of Urban Environment refers to the both the current state of the land and future intention for the land, it would be logical to assume that the intended future state of the land relates to the planned future state of the land i.e. that anticipated by the extant CRPS, Our Space 2018-2048 and, now the PDP. As the Implementation of Policies 3 and 4 of the NPS-UD will bring increased development capacity within and adjacent to centres and the MDRS will bring additional development capacity within existing residential zoned areas, I considered it unlikely that updates to the CRPS and Our Space would find it necessary to identify rural land such as that at Ōhoka to meet required development capacity.

26. I also consider that limited weight should be given to Objective 4 (and the associated Policy 6) of the NPS-UD.

27. Objective 4 states:

New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.

28. I consider that the very significant change, from rural to urban of the submitters land extends beyond the level of change anticipated in Objective 4, which speaks to areas which are already urbanised. This very significant change is therefore beyond the level of change which Policy 6 indicates should not be considered an adverse effect. Consideration must therefore still be given to Part 2 and the need to avoid, remedy, or mitigate any adverse effects of activities on the environment.

The existing character of the area

29. Objective SD-02 of the PDP expects that new development '*recognises existing character, amenity values, and is attractive and functional to residents, businesses and visitors*', and Waimakariri 2048 District Development Strategy seeks to '*Retain the character of the District's existing small settlements*'³ the existing character of Ōhoka.

30. At the previous hearing all relevant experts described the '*rural village character*' of Ōhoka, as this is a term used in the ODP, and there was a wide range of views regarding what these terms mean, although I note,

³ Waimakariri 2048 District Development Strategy Page 20

from a comparison of Ms Lauenstein's PC31 and PDP evidence that she has dropped the term village and instead now utilises the term township.

31. With the changes proposed by the PDP, the question has become more clear; would the rezoning of the land recognise and retain the existing character and amenity values of the settlement as existing?.
32. In my view the following high level matters contribute to the character and amenity values of Ōhoka as it currently exists:
 - 32.1. The wider area is accessed by a large grid road network. This network creates the overall structure of the area.
 - 32.2. Ōhoka village consists of residential lots, limited community uses, and some commercial premises strung along a 1.5km section of Mill Road and an 800m section of Bradleys Road. There are gaps within this development and the layout of sites varies. It is this development that passersby first experience and it is likely that this is what will form their lasting impression of the village.
 - 32.3. Additional residential development on large lots is provided on along Keetley Place and Hallfield Drive, both of which are culs-de-sac. Passerby are less likely to be aware of these, as they extend off of the main 'grid' streets, away from public view (albeit that Hallfield Drive is more recently developed and planting less established within lots).
 - 32.4. Large lifestyle blocks exist to the east of Whites Road. The setback of buildings on these varies, although the planting along front boundaries limits views into many of these sites.
33. Whilst there are other features which contribute to the character and amenity of the village, such as the stream and the vegetation alongside this, I consider that the lasting impression of the character of Ōhoka is:

Residential, commercial and community developments on generous lots fronting Mill Road, within a wider area developed for lifestyle development.
34. I consider that it is this 'summary' statement of the character of the area which provides the best basis for considering Objective SD-02 of the PDP.

35. In contrast to this existing character, the submissions would deliver an urban form of development, with the majority of residential lots (850 lots) being within the GRZ, where lot sizes of down to 500m² are allowable, or in the alternative put forward, in the MDRZ where there is no minimum site size for multi-unit residential development (where design statement and land use consent have been submitted and approved).
36. By comparison the RLZ zoning proposed for the submission land in the PDP allows lifestyle development of one dwelling per 4Ha; i.e. the submissions seeks sites which are at least eighty times smaller.
37. In view of this I do not accept Mr Falconer's view⁴ that the proposal provides a compatible urban form that responds to the existing Ōhoka urban area context and contributes to a well-functioning urban environment. The development which would be delivered were the land rezoned is entirely at odds with the existing character of Ōhoka.

Are there fundamental flaws with the existing village such that the development proposed is critical?

38. I note that Ms Laurensen sets out the historic evolution of the area, and identifies existing shortcomings:

*'In summary, the growth pattern of Ōhoka has been in response to firstly the need for rural services and secondly to the demand of rural lifestyle. This resulted in a form that is incomplete, even within the core. There are several holes in the fabric making the township incohesive and internally disconnected. This is most noticeable along Mill Road, the main road through the centre of Ōhoka, where many gaps remain to be filled. This sense of disconnectedness also shows in the vehicular and pedestrian connectivity, or lack thereof, between the inner core of Ōhoka and the outer low density, rural lifestyle blocks.'*⁵

39. It is my view that these shortcomings are only relevant if we consider the settlement with 'urban eyes'. These are features of the area that likely encouraged many of the existing residents to live there; they are features which are typical of similar lifestyle areas around all of New

⁴ Evidence of Mr Falconer – para 37/38

⁵ Evidence of Ms Laurensen – para 40

Zealand's cities. They are popular as they offer an alternative to urban living.

40. Likewise, I consider that Mr Falconer has conflated the popularity of the farmers market with a need to provide for significantly increased population in the area where he states:

*'Indicative of Ōhoka's potential role as a larger centre in a growth area is the development of a regionally popular farmers market that is held weekly and features over 50 stalls and regularly attracts large numbers of people visiting from Christchurch and across the broader Canterbury region.'*⁶

41. Miss Laruensten makes a similar comment.⁷
42. In my view, the farmers market is more likely illustrative of the success of a local enterprise and the current desire of consumers to purchase locally produced goods and does not in any way provide a justification for additional, unplanned development in the area.

The impact of additional development anticipated by the PDP

43. I note that Mr Milne places some weight on the reduction in open rural character that is anticipated by the PDP⁸ and notes that:

*'The outcome on rural amenity of the RLZ would be the restriction of all open rural views that are currently afforded by the Site.'*⁹

44. As illustrated in Mr Milne's *'Rural Lifestyle Concept'*¹⁰, the PDP allows the subdivision of the land into 36 x 4Ha lots. I see this as being in no way comparable to the subdivision of the area for up to 850 residential units and associated commercial and community uses.
45. This form of development is illustrated by the recently sold 90 Pattersons Road, Ōhoka. See [Link to Sales Details](#).

⁶ Evidence of Mr Falconer – para 22

⁷ Evidence of Ms Laurenson – para 43

⁸ Evidence of Mr Milne – para 7 and 16

⁹ Evidence of Mr Milne – para 21

¹⁰ Evidence of Mr Milne – Attachment 1 page 3



Figure 1: 90 Pattersons Road - boundary shown dashed

46. As illustrated on Figure 1, the existing 341m² dwelling, 192m² sheds, and associated driveways at 90 Pattersons Road appear as a very small feature on the 4Ha site, the majority of which remains available for grazing or other agricultural use.
47. Whilst I accept that the planting along the street frontage of the land does limit views across it, this is no different to a scenario which could occur were the whole site to remain in agricultural use and a shelter belt planted along the frontage.
48. Were a similar 4Ha site developed in line with the submission, it would not be unrealistic for there to be 50 dwellings on the land.¹¹ Even with planting along the street frontage, a passerby would be aware of the residential uses beyond this, by reason on the glimpsed views which are often possible through vegetation when passing by in a car, potential solid fences on the inside of the boundary planting, glimpses of multiple roofs of 8m high buildings, the size and form of intersections formed with Whites Road, Bradleys Road and Mill Road, views into the area along these streets and the general significant additional activity associated with around 2100 new residents (recognising the existing population is under 300).

¹¹ 12 dwellings per hectare = 48 dwellings (or alternatively assuming 70% of site is developable for residential lots, each being 500m² = 56 dwellings).

49. In addition, the applicant's desire to screen all new development, apart from the commercial centre, from the existing roads limits physical connections to the surrounding area to the locations of formed intersections and provides the impression that the area is inward looking and not associated with its surroundings i.e. there is a perception that the area is not connected to its surroundings.

Is the area a natural extension to Ōhoka

50. Mr Compton-Moen suggests that the area is a natural extension to Ōhoka.¹² Mr Falconer suggests that the area will augment the existing historic Ōhoka settlement with the provision of residential dwellings and local commercial areas.¹³
51. Such comments provide the impression that the area will be 'an addition' to the existing place, and that the form and character of the existing place will remain. I understand that the existing population of the area is under 300 and the total future population of the enhanced Ōhoka will be around 2400; i.e. the population of the new subdivision will be around 7 x that of the existing village.
52. Mr Nicholson's Figure 2, referred to above, clearly illustrates that the proposed rezoned land would not be consolidated with the existing settlement.
53. The proposed commercial uses are separated by three existing dwellings (around 115m) from the existing petrol filling station and dairy (which currently provide for the immediate day to day needs of the existing community), rather than provide an extension to this. They will essentially be a facility to benefit the around 88% of residents who will live in the new housing. Whilst they will also benefit the existing residents, they are not facilities required locally for an existing population of 300.
54. The enhanced 'Ōhoka village centre', as Mr Falconer describes the whole area proposed for rezoning¹⁴, will be the dominant feature of the area; the additional land will not augment the existing Ōhoka but will create an entirely new place of which the existing becomes a small part. This is also clearly illustrated by Figure 2 of Mr Nicholson's evidence.

¹² Evidence of Mr Compton-Moen – para 11

¹³ Evidence of Mr Falconer – para 27

¹⁴ Evidence of Mr Falconer – para 28.1

55. As such I cannot agree that the area is a natural extension to Ōhoka; it is essentially a new town within the rural area.

Conclusion

56. The requested rezoning proposes a new urban development which does not reflect the existing character or amenity of Ōhoka, on land which is not identified for such development and out of step with the expectations of the CRPS.
57. It is not a natural extension to Ōhoka; it is essentially a new town within the rural area. It in no way reflects the low density living that the PDP intends.
58. For the reasons as outlined in my evidence, I cannot support the requested rezoning.

Dated: 12 June 2024

A handwritten signature in blue ink, appearing to read 'R. Knott', with a horizontal line extending to the right.

Richard John Knott