

**BEFORE** an Independent Hearing Commissioner

**IN THE MATTER** of the Resource Management Act 1991 (“RMA”)

**AND**

**IN THE MATTER** of hearing submissions and further submissions  
in respect of Waipa District Council – Plan  
Change 13 – Uplifting of Deferred Zones

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**STATEMENT OF EVIDENCE BY KATHRYN ANNE DREW  
ON BEHALF OF KOTARE PROPERTIES LTD**

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## INTRODUCTION

1. My full name is Kathryn Anne Drew.
2. I am a senior planner at Bloxam Burnett & Olliver Ltd (“BBO”), a firm of consulting engineers, planners and surveyors, based in Hamilton.
3. I have been employed in resource management and planning related positions in local government and the private sector for 19 years, with the last 13 of those being at BBO.
4. My qualifications are a Bachelor of Resource and Environmental Planning (Hons) from Massey University. I am also a full member of the New Zealand Planning Institute.
5. My planning experience has included the preparation and processing various resource consent applications for both Council’s and private clients. I have also prepared and processed Plan Changes, made submissions on Plan Changes and on District Plan reviews.
6. In relation to this hearing I am authorised to give evidence on behalf of Kotare Properties Ltd (“Kotare”). I am the author of the submission and further submissions prepared on behalf of Kotare in relation to Plan Change 13 (“PC13”) to the Waipa District Plan (“District Plan”). I have also overseen the preparation of the subdivision consent application for the land within the C4 growth cell that Kotare have an interest in<sup>1</sup>.
7. I have read the Environment Court’s ‘Code of Conduct for Expert Witnesses’ as contained in the Environment Court’s Consolidated Practice Note 2014 and agree to comply with it. I have complied with it when preparing my written statement of evidence.

## EVIDENCE STRUCTURE

8. This evidence provides a planning assessment of the relief sought in the Kotare submission on PC13. Topics covered in this evidence includes:
  - The background to the Kotare submission;
  - The relief sought;
  - Benefits of the amended C4 growth cell Structure Plan;
  - Council’s position assessment;
  - Commentary on the further submission made by Mr Gregory McCarthy<sup>2</sup> which oppose the Kotare submission; and
  - Commentary on the further submissions Kotare made and Council’s position on those.

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<sup>1</sup> Council reference SP/0084/21

<sup>2</sup> Submitter 6

## BACKGROUND TO SUBMISSION

9. Kotare is a land development company established and operated by John Illingsworth and Graeme Lee. Both John and Graeme are civil engineers with over 90 years of civil construction experience between them.
10. Kotare has a history of successful subdivision within the Waipa District. Kotare is also in the process of consenting two new subdivisions, one in Te Awamutu within the T2 growth cell off Frontier Road and one that is located within the C4 growth cell in Cambridge. The land within the C4 growth cell is located directly north of Silverwood Lane, east of Cambridge Road and includes part of the unnamed gully head that separates the site from the existing Cambridge Park development.
11. The C4 growth cell site is the focus of this evidence, as it is directly affected by PC13. This is because PC13 proposes to rezone the land from deferred Residential to Residential and because it proposed to incorporate into the District Plan (as Appendix 23) the Structure Plan that has been endorsed by Council.
12. It is worth noting that at the time of the Structure Plan for the C4 growth cell was prepared and consulted on, Kotare had no interest in the C4 growth cell, so was not an active participant in that process.
13. To develop a portion of the C4 growth cell, Kotare have either purchased outright or have sale and purchase agreements with landowners within this growth cell. This means they now have an interest in approximately 8ha of the growth cell. The extent of their site is demonstrated on the Subdivision Concept Plan in attached (**Attachment A**), being Lot 4 as shown on that Plan. As you can see in the Subdivision Concept Plan Kotare's future landholding excludes the three dwellings that are already located on the site. Those dwellings are proposed to be retained by the two existing landowners.
14. Kotare has advanced the subdivision design and technical reporting required to support a subdivision consent application for the site to a stage whereby the preferred development outcome, sought by Kotare, has been finalised. That outcome is one that provides for 68 lots, four of which will be developed for higher density housing as they adjoin the gully edge and proposed open space recreation areas. The roading layout has also been designed to provide to one connection point to Silverwood Lane and two connections to the land north of their site. This layout has been designed to avoid the three existing dwellings and therefore differs slightly from the endorsed Structure Plan alignment. A subdivision consent for that development outcome, as per the attached scheme plan (refer **Attachment A**), was lodged with Waipa District Council on the 9 June 2021.

## RELIEF SOUGHT

15. The key point of the Kotare submission is a general support for the rezoning (from deferred residential to residential) enabled by PC13. The rezoning will help enable the development

outcome sought be achieved in the recently lodged subdivision consent application. As noted in the s42A report, Cambridge is experiencing unprecedented growth and demand for housing and needs this land rezoned and developed to meet their obligations under the National Policy Statement on Urban Development. Kotare have first hand knowledge to this to, having advised me that all of their sections within this development are now pre-sold, subject to consent approval.

16. As Kotare has advanced their subdivision design and supporting technical reporting to the point whereby subdivision consent has been lodged, the original submission on PC13 that I lodged also sought a number of amendments to the C4 growth cell Structure Plan and supporting commentary. That submission was made to achieve alignment between the Structure Plan and the development outcomes being advanced by Kotare in their subdivision consent. This is because, although Structure Plans are used by Council's to be a framework to guide development, they are sometime seen as a hard and fast tool that developers need to adhere to. Kotare wanted to avoid that risk and ensuring reasonable flexibility, by aligning the Structure Plan with their development outcome.
17. The key changes to the Structure Plan plan and text changes that Kotare sought included:
  - a) Amending the location of the key connection point to Silverwood Lane, to a position further east, for the purpose of creating increased separation from the adjacent major intersection. This location will also avoid the collector road traversing through the existing dwellings that are to be retained. This change effectively flips the collector road from the alignment provided for Structure Plan and also requires a slight realignment through the McCarthy property to the south.
  - b) Amending the extent of the compact housing overlay on their site to reflect the four larger compact housing lots proposed in the subdivision consent lodged.
  - c) Creating more flexibility in the wording around the type of stormwater devices, the number and location of stormwater collection points and number of reserve locations and ensuring that the wording confirms that the Structure Plan is conceptual, not preferred.
18. A copy of endorsed Structure Plan and the amendments sought by Kotare are attached to this evidence (see **Attachment B**).

#### **BENEFITS OF THE AMENDED STRUCTURE PLAN**

19. As I have articulated above, the key driver for the amendment, sought by Kotare, to the Structure Plan were to:
  - a) Avoid any future issues with consenting development of the site when the alignment differs slightly from the 'preferred' Structure Plan layout, including avoiding potential notification risks during the subdivision consent processing.
  - b) Avoiding the existing dwellings. As currently drawn the Structure Plan crosses between two existing properties and would require removal of one house. That house is in the process

of being substantially upgraded, so it does not make economical sense to require its removal or relocation to facilitate a road.

- c) Providing more flexibility in design outcomes.

20. In my opinion the main benefits of the Amended Structure Plan are as follows:

- a) It provides for an increased separation between the new Cambridge Road/Lamb Street/Kaipaki Road roundabout and the internal roundabout, which has safety, efficiency and land use benefits. The change is approximately 50m from the 90m separation recommended as a minimum<sup>3</sup>.
- b) It provides for a clear linear collector road connection to the land to the north and also to the recreational reserve, without the need to zig zag through the development. This better achieves the function of a collector road.
- c) It provides for increased pedestrian connections between the Kotare land and Cambridge Road/Silverwood Lane to improve connectivity.
- d) The amendment to the north-south alignment for one of the roads linking the two east-west road provides supports the intent of aligning roads and paths with vistas and connection to the gully edge reserve (being a design principle of the Structure Plan S23.3.4).
- e) The extent of the compact housing area policy area overlay has been reduced so that it does not connect to Silverwood Lane to enable standard residential development in that location as such interfaces better with the form and function of Silverwood Lane.
- f) It provides more flexibility in terms of design outcomes in relation to stormwater and reserves by not fixing an outcome or a number.

## **COUNCIL POSITION**

21. The s42A report for PC13 has rejected the relief sought by the Kotare<sup>4</sup>. Their reasoning is that while the submitter has made some valid points within their submission, the development of the Structure Plan been through an extensive process supported by technical reports and Kotare provided no technical detail as why the amendments they seek are better than the endorsed Structure Plan.

22. In relation to those statements, I make the following points/observations:

- a) The points made are considered by the s42A to be valid because, in my opinion, the language used to support the Structure Plan is too prescriptive. The changes Kotare have sought therefore try to remove the prescription from the supporting statements and

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<sup>3</sup> Paragraph 3.4 of the C4 Growth Cell Transportation Assessment prepared by Gray Matter dated 20 December 2019

<sup>4</sup> Paragraph 5.5.13 of the S42A report.

acknowledge that overtime situations, solutions and outcomes can change. Statements such as the number of reserves, the type of treatment and the use of language that states 'preferred' does not provide confidence that design changes will be considered by Council in the future resource consent processes.

- b) Whilst I acknowledge that the Structure Plan preparation has been through an extensive process, including community engagement and endorsement by Council, that process, including the engagement has not been through an RMA process whereby submissions/appeals could have been lodged on the outcomes of that Structure Plan. The inclusion of the Structure Plan as part of PC13 is the first opportunity the community has the legally challenge the outcomes.
- c) In relation to technical reporting, this evidence and the original submission has been informed by the technical reports that Kotare has prepared to support their subdivision consent application, recently lodged, which in turn support the outcomes sought in the Kotare submission. The statements are therefore founded on those technical inputs.

#### **MR McCARTHY'S SUBMISSION**

- 23. The submission from Mr McCarthy raises three issues that I would like to address further in this evidence. Those points are:
  - a) The purpose and scope of PC13 is to uplift the zoning of the C4 growth cell and an attempt to amend the recently completed and Council endorsed Structure Plan is outside the scope of the PC13.
  - b) The Structure Plan has been endorsed by Council and is the result of an extensive process that included detailed engagement with Council staff, consultants and the community. This process and its outcomes have been relied on by affected landowners and it would be inappropriate to make ad-hoc amendments.
  - c) The amendments would have negative impacts on his land including increased land requirements for roading, reduction of land area available for housing and more land been severed to the west of the proposed road realignment.
- 24. Turning first to the scope issue, it is my opinion that the relief sought by Kotare is within scope for PC13 for the following reasons.
  - a) The leading case on this issue of scope is *Palmerston North CC v Motor Machinists Limited* [2013] NZHC 1290, which sets out two tests which must be satisfied for a submission to be "on" a proposed plan change. Those tests are:
    - i. The submission must reasonably be said to fall within the ambit of the plan change. If the submission raises matters addressed in the s32 Report that is a reasonable indication it is "on" the plan change.

- ii. Whether there is a real risk that persons directly or potentially directly affected by the additional changes proposed in a submission will have been denied an effective opportunity to respond to those additional changes.
- b) The Kotare submission satisfies the first test. Although the s32 analysis does not directly relate to the C4 Structure Plan and associated text being included in the District Plan, one of the outcomes of PC13 is that three new endorsed Structure Plans will be inserted into the District Plan. It is therefore reasonable to glean that the request falls within the ambient of the plan change, as the inclusion of those Structure Plans is a direct outcome of PC13. Furthermore, the author of this section of the s42A report has not identified that this request is out of scope, so it is assumed that they agree that the changes are within scope.
- c) The Kotare submission also satisfies the second test. Being an original submission on PC13, the submission has not prejudiced public participation as potentially affected parties have had an opportunity to lodge further submission on it (as has been done by Mr McCarthy). The submission is also not “left-field” for the reasons set out in the following paragraph around differing landowners having differing interests.
25. Secondly, as noted at paragraph 22(b) of this evidence, the Structure Plan preparation has not been through a RMA engagement process that can be challenged. The inclusion of the Structure Plan as part of PC13 is the first opening the community to legally challenge/scrutinise the outcomes, hence Kotare are using this opportunity. Furthermore, as I noted earlier that engagement was undertaken prior to Kotare having an interest in the land. Its reasonable thus to assume that as landowners change, interests and drivers also change, which is the case now.
26. In relation to the third matter, Kotare Consultants have prepared a Masterplan layout plan for the land north and south of the Kotare site to demonstrate the potential yield and outcomes for those properties, having due regard to the impacts the amendment in the Silverwood Lane connection point will have. This concept plan is attached (see **Attachment A**). In my opinion any increased land requirements for roading will be off-set by the ability for residential lots to be developed on either side of the realigned Lamb Street. That outcome cannot be achieved with the current Structure Plan arrangement.

#### **THE FURTHER SUBMISSIONS LODGED**

27. On Kotare’s behalf I also lodged a number of further submissions on matters relating to the boundary line for the urban limits<sup>5</sup>, the submissions received by the Cambridge Motorcycle Club and its supporters<sup>6</sup> opposing the rezoning of the C4 growth cell and the appropriateness and timing for archaeological<sup>7</sup> and vegetation assessments<sup>8</sup>. I note that Council’s recommendation is to ‘accept’ those further submissions points. For the reasons, set out in the original

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<sup>5</sup> FS6/15

<sup>6</sup> FS6/1, FS6/2, FS6/3, FS6/19 and FS6/20

<sup>7</sup> FS6/12, FS6/13, FS6/14

<sup>8</sup> FS6/16

submission, I request that the Commission adopts the recommendation in the s42A report for those further submissions.

## **CONCLUSION**

28. In conclusion, I confirm that it is my opinion that:

- a) The relief sought is valid, is within scope of PC13 and is based off technical reporting that has informed the Kotare subdivision consent application and will lead to a better development outcome for the site and surrounding properties.
- b) The points raised by Mr McCarthy have been considered and addressed by Kotare in their Masterplan design and will not prejudice or unduly restrict his development potential.
- g) For these reasons, I request that the Council's recommendation to reject submission points 19/4, 19/5, 19/6, 19/7, 19/8 and 19/9 is amended from 'reject' to 'accept' and that the consequential changes sought by Kotare to the C4 Structure Plan are adopted by Council.

**Dated:** 11 June 2021



**Kathryn Drew**



**ATTACHMENT A:**  
**Site Layout Plan, Subdivision Scheme Plan and Masterplan**  
**Concept Plan**

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MEMORANDUM OF EASEMENTS (Pursuant to s243 Resource Management Act 1991)			
Purpose/Interest	Shown	Burdened Land (Servient Tenement)	Benefited Land (Dominant Tenement)
RIGHT OF WAY	(A)	LOT 4 HEREON	LOTS 1 & 2 HEREON
	(B)	LOT 4 HEREON	LOT 3 HEREON
		LOT 1 HEREON	LOT 2 HEREON



<b>PROPERTY DETAILS:</b>
<b>LEGAL DESCRIPTION:</b>
Pt LOT 2 DPS 58052 and LOTS 1 & 2 DP 356214
- AREA: 9.4 Ha
- RTS SA51B/149, 229285, & 229286
- WAIPA DISTRICT COUNCIL
- ZONING: DEFERRED RESIDENTIAL



**PLAN TITLE**  
**SUBDIVISION CONCEPT PLAN**  
 LOTS 1 - 4 being a Subdivision of Pt Lot 2 DPS 58052 & Lot 1 DP 35621  
 At 3774 & 1/3774 CAMBRIDGE ROAD & 9 SILVERWOOD LANE  
 KOTARE PROPERTIES LTD

<b>REVISION</b>	Rev0 Original	9 FEB 2021	<b>JOB</b>	1003	<b>SHEET</b>	SP
<b>DATE</b>	17 March 2021		<b>SCALE AT A3</b>	1:1500		REV 3
<b>CAD</b>	CPM					

C:\USERS\CIARA\KOTARE CONSULTANTS\KOTARE PROJECTS - DOCUMENTS\1003 KOTARE CA\5 DESIGN\1003-SP SUBDIVISION CONCEPT PLAN REV3.DWG

KOTARE PARK

**AMALGAMATION CONDITION:**  
(Pursuant to Section 220(1)(b)(iv) Resource Management Act 1991)

THAT LOT 301 HEREON BE HELD AS TO FOUR UNDIVIDED ONE-FOURTH SHARES BY THE OWNERS OF LOTS 16 TO 19 HEREON SEE LINZ REQUEST .....

THAT LOT 302 HEREON BE HELD AS TO FOUR UNDIVIDED ONE-FOURTH SHARES BY THE OWNERS OF LOTS 10 TO 13 HEREON SEE LINZ REQUEST .....

THAT LOT 303 HEREON BE HELD AS TO TWO UNDIVIDED ONE-HALF SHARES BY THE OWNERS OF LOTS 5 AND 6 HEREON SEE LINZ REQUEST .....

THAT LOT 304 HEREON BE HELD AS TO TWO UNDIVIDED ONE-HALF SHARES BY THE OWNERS OF LOTS 39 AND 40 HEREON SEE LINZ REQUEST .....

THAT LOT 305 HEREON BE HELD AS TO TWO UNDIVIDED ONE-HALF SHARES BY THE OWNERS OF LOTS 41 AND 42 HEREON SEE LINZ REQUEST .....

MEMORANDUM OF EASEMENTS (Pursuant to s243 Resource Management Act 1991)			
Purpose/Interest	Shown	Burdened Land (Servient Tenement)	Benefited Land (Dominant Tenement)
RIGHT OF WAY	(A)	LOT 301 HEREON	LOTS 16 - 19 HEREON
RIGHT TO CONVEY WATER, TELECOMMUNICATIONS & COMPUTER MEDIA, ELECTRICITY & GAS	(B)	LOT 302 HEREON	LOTS 10 - 13 HEREON
	(C)	LOT 303 HEREON	LOTS 5 & 6 HEREON
RIGHT TO DRAIN WATER	(D)	LOT 304 HEREON	LOTS 39 & 40 HEREON
RIGHT TO DRAIN SEWAGE	(E)	LOT 305 HEREON	LOTS 41 & 42 HEREON

TOTAL NUMBER OF REPRESENTATIVE CARPARKS = 111

**KEY**

- Lot with 13mØ Shape Factor
- Yard Setbacks as per Waipa District Plan



LOT INFORMATION - Kotare Park	
TOTAL NO. OF LOTS	64
AVERAGE LOT SIZE	552m2
NO. OF FRONT LOTS	48
AVERAGE FRONT LOT SIZE	542m2
NO. OF REAR LOTS	16
AVERAGE REAR LOT SIZE	582m2
SMALLEST LOT SIZE	500m2
LARGEST LOT SIZE	890m2

MEMORANDUM OF EASEMENTS TO BE SURRENDERED (Pursuant to s243 Resource Management Act 1991)			
Purpose/Interest	Shown	Burdened Land (Servient Tenement)	Benefited Land (Dominant Tenement)
RIGHT OF WAY	(A)	LOT 4 SP/0061/12	LOTS 1 & 2 SP/0061/12
	(B)	LOT 4 SP/0061/12	LOT 3 SP/0061/12
	(C)	LOT 1 SP/0061/12	LOT 2 SP/0061/12
ELECTRICITY	A	LOTS 2 & 4 SP/0061/12	LOT 3 SP/0061/12
	C	LOT 3 SP/0061/12	LOT 2 SP/0061/12
TELECOMM.	B	LOTS 3 & 4 SP/0061/12	LOT 2 SP/0061/12
	B	LOTS 3 & 4 SP/0061/12	LOT 2 SP/0061/12

**PROPERTY DETAILS:**  
**LEGAL DESCRIPTION:**  
Pt LOT 2 DPS 58052 and LOTS 1 & 2 DP 356214  
- AREA: 9.4 Ha  
- RTs SA51B/149, 229285, & 229286  
- WAIPA DISTRICT COUNCIL  
- ZONING: DEFERRED RESIDENTIAL

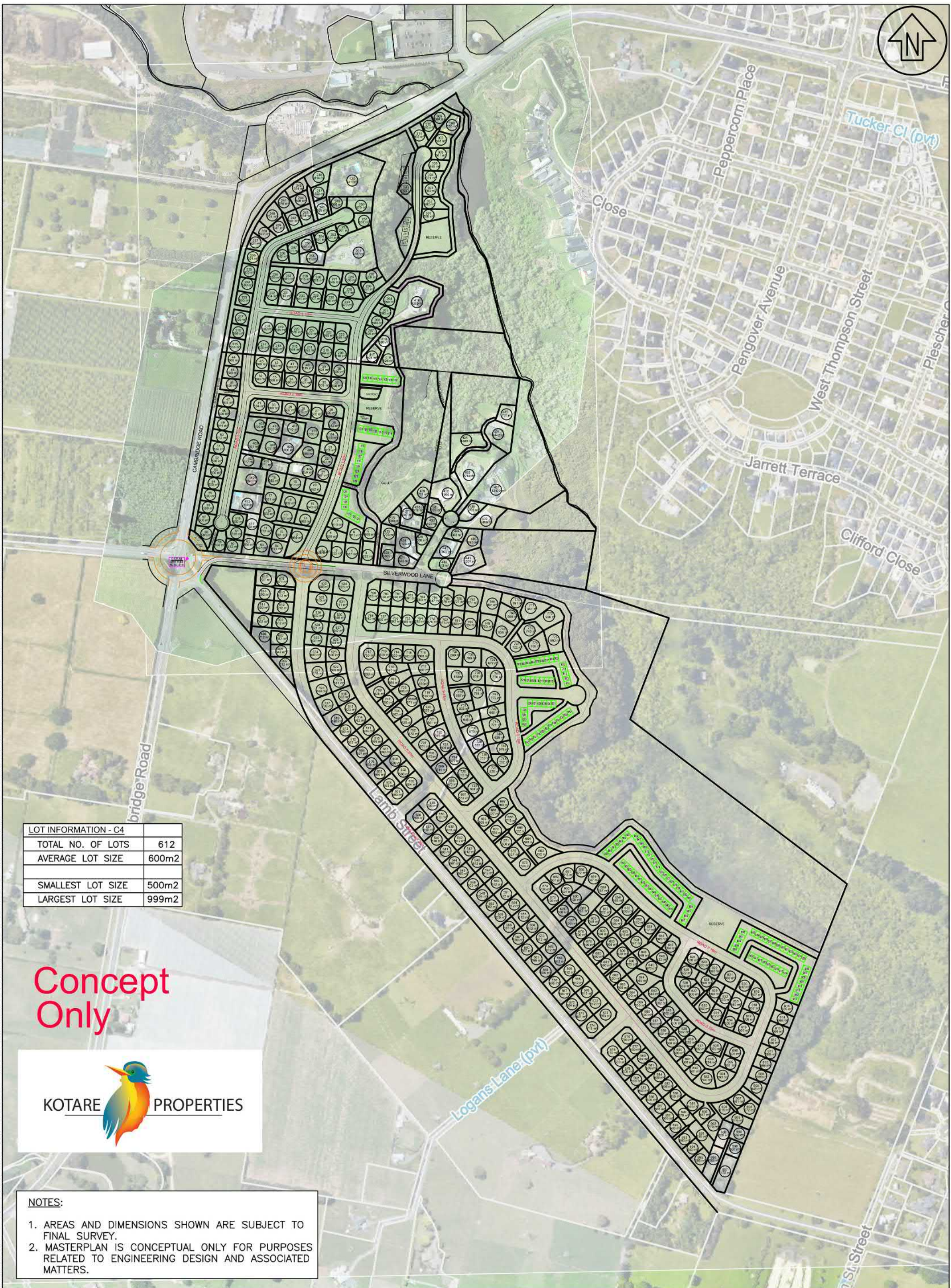
**NOTES:**

- ANY HEIGHTS ARE IN TERMS OF MOTURIKI VERTICAL DATUM 1953
- DATUM MARK IT IV DPS 39924 (DPKU) RL=63.41
- CONTOUR INTERVAL N/A
- AREAS AND DIMENSIONS SHOWN ARE SUBJECT TO FINAL SURVEY.

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LOT INFORMATION - C4	
TOTAL NO. OF LOTS	612
AVERAGE LOT SIZE	600m <sup>2</sup>
SMALLEST LOT SIZE	500m <sup>2</sup>
LARGEST LOT SIZE	999m <sup>2</sup>

**Concept  
Only**



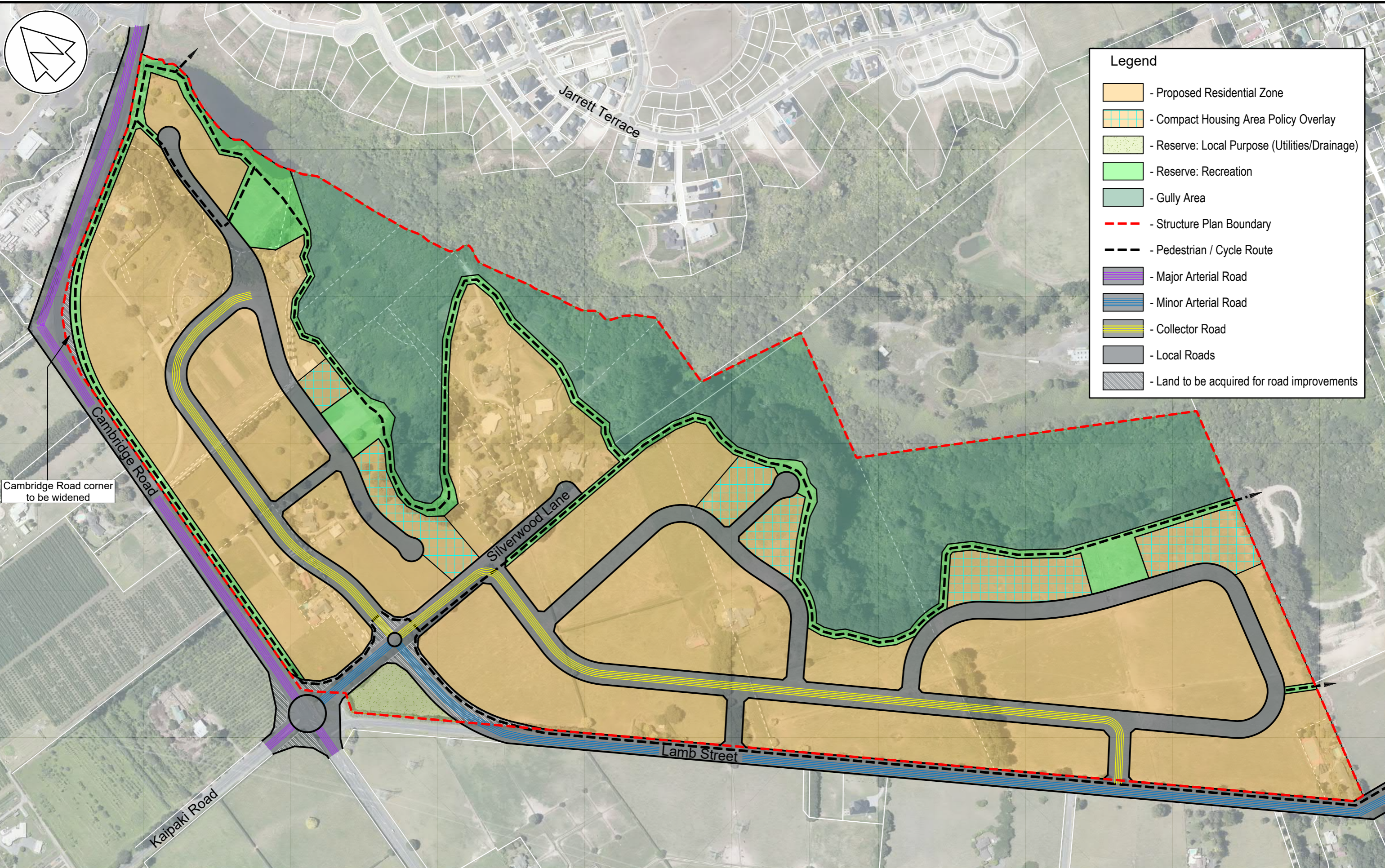
- NOTES:**
1. AREAS AND DIMENSIONS SHOWN ARE SUBJECT TO FINAL SURVEY.
  2. MASTERPLAN IS CONCEPTUAL ONLY FOR PURPOSES RELATED TO ENGINEERING DESIGN AND ASSOCIATED MATTERS.



MASTERPLAN CONCEPT  
 C4 GROWTH CELL, CAMBRIDGE  
 CAMBRIDGE ROAD, SILVERWOOD LANE, LAMB STREET  
 KOTARE PROPERTIES LTD

<b>REVISION</b>	Rev0 Original 8 FEB 2021	<b>JOB</b>	1003	<b>SHEET</b>	10
<b>DATE</b>	13 FEBRUARY 2021	<b>SCALE AT A3</b>	1:5000		Rev 0
<b>CAD</b>	CPM				

**ATTACHMENT B:**  
**Endorsed C4 Structure Plan and Kotare Amended Structure  
Plan**



- Legend**
- Proposed Residential Zone
  - Compact Housing Area Policy Overlay
  - Reserve: Local Purpose (Utilities/Drainage)
  - Reserve: Recreation
  - Gully Area
  - Structure Plan Boundary
  - Pedestrian / Cycle Route
  - Major Arterial Road
  - Minor Arterial Road
  - Collector Road
  - Local Roads
  - Land to be acquired for road improvements

Cambridge Road corner to be widened




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Document ID: 0469501  
Version: 1, Version Date: 16/09/2020

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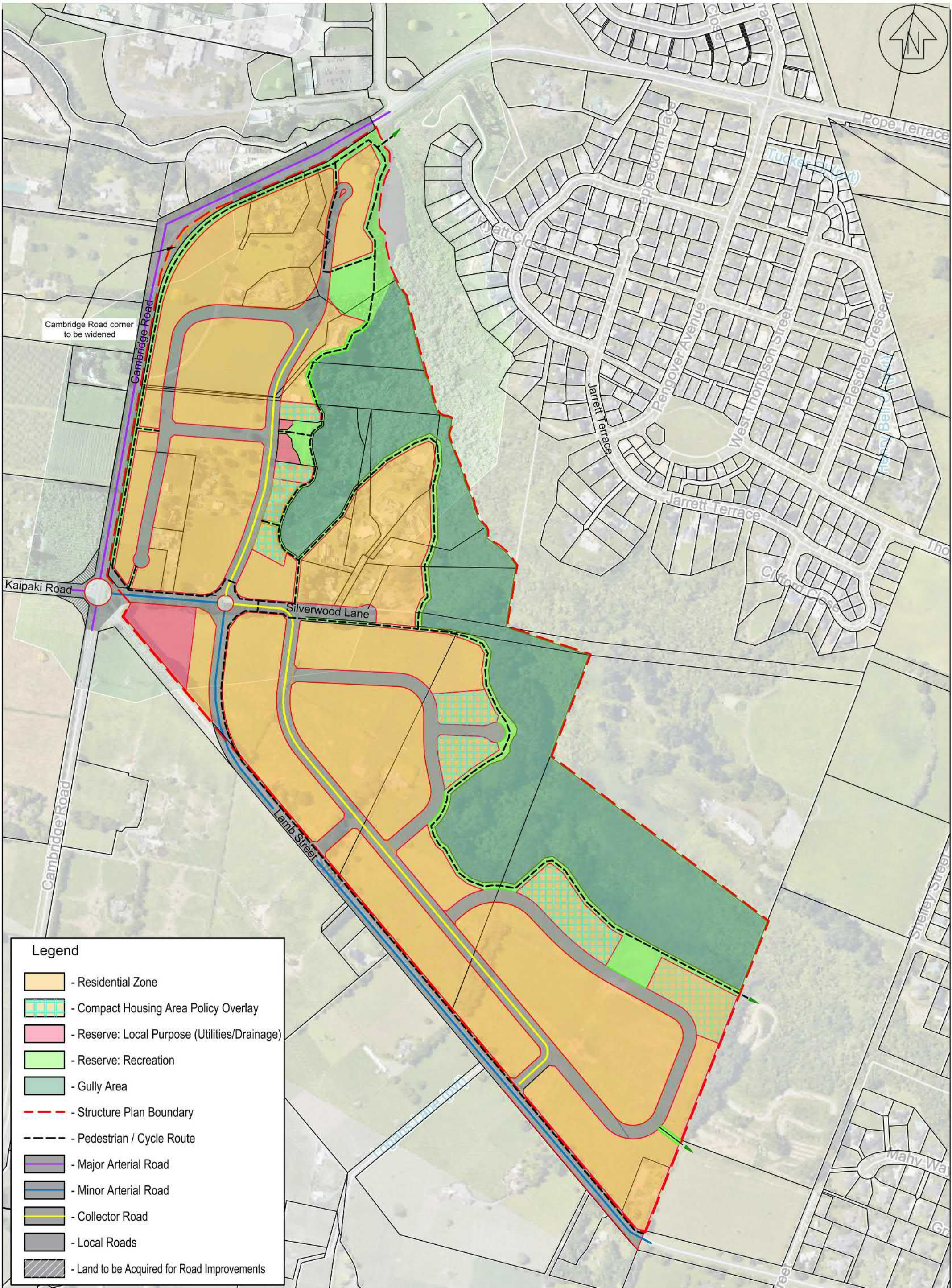


**Waipā**  
DISTRICT COUNCIL

# C4 STRUCTURE PLAN

SCALE: 1:4000	ORIGINAL PLAN SIZE: A3	DRAWN: AJW	DESIGNED: PBC
DATE: Sept 2020	SHEET: 1 of 1	CHECKED: PBC	
REV: C	NOTE: BOUNDARIES AND DIMENSIONS AND AREAS ARE APPROXIMATE AND SUBJECT TO ALTERATION BY APPROVAL OR SURVEY. LEVELS ARE IN TERMS OF: N/A ORIGIN OF LEVELS - N/A		
THIS DRAWING OR DESIGN REMAINS THE PROPERTY OF, AND MAY NOT BE REPRODUCED, WITHOUT THE WRITTEN PERMISSION OF COGSWELL SURVEYS LTD			

PLOT FILE: C4 Structure Plan1.PLOTTED.Tue Sep 15 15:54:11 2020



Cambridge Road corner to be widened

**Legend**

- Residential Zone
- Compact Housing Area Policy Overlay
- Reserve: Local Purpose (Utilities/Drainage)
- Reserve: Recreation
- Gully Area
- Structure Plan Boundary
- Pedestrian / Cycle Route
- Major Arterial Road
- Minor Arterial Road
- Collector Road
- Local Roads
- Land to be Acquired for Road Improvements



PLAN TITLE  
**C4 STRUCTURE PLAN**  
**Proposed Alterations for Plan Change 13**  
**APRIL 2021**

REVISION	JOB	SHEET
DATE APRIL 2021	SCALE AT A3 1:5000	Rev 1