



FAST TRACK APPROVALS ACT 2024 (FTAA 2024) TECHNICAL ADVICE

Carter Group Ōhoka Substantive Application

File No	FTAA-2606-1253
Date	8.10.26
Memo To	Kate Barry-Piceno - Ōhoka Residential Subdivision Expert Panel Chair
From	Jane Rennie, Boffa Miskell, Partner Registered Urban Designer (Urban Designers Institute of Aotearoa)
Subject	Urban Design

1. EXECUTIVE SUMMARY

I have undertaken a peer review of the Urban Design Assessment ('UDA') prepared by DCM Urban for the proposed Ōhoka Fast-track development (the Proposal). While the revised UDA provides additional information and better explains the design rationale, I remain of the view that it does not adequately demonstrate that the Proposal will result in a well-functioning urban environment or that a development of this scale is appropriate in the Ōhoka context.

My key areas of disagreement relate to the scale and strategic location of the development, the proposed urban structure, and the extent to which the Proposal will reinforce Ōhoka's rural village character. Based on the information provided, I do not consider that it has been adequately demonstrated that Ōhoka is suitable for the scale of growth proposed or that the Proposal is appropriately aligned with the wider strategic planning framework. The extent of growth proposed would substantially expand Ōhoka beyond its current role and function, with ongoing concerns relating to car dependency, accessibility to employment and community services, and uncertainty regarding the delivery of future public transport infrastructure.

I am also not convinced that the proposed layout will achieve the high levels of connectivity, permeability and accessibility described in the UDA. While the Proposal includes walking and cycling networks, the overall structure remains relatively inward-focused, with waterways, the retirement village, polo grounds and other land uses potentially creating barriers between neighbourhoods and key destinations, limiting walkability and reducing the extent of accessible destinations within comfortable walking distances.

In relation to character, and in the context of District Plan Policy SUB-P1 '*Design and Amenity Enable subdivision that incorporates best practice urban design, access to open space and CPTED principles, recognises cultural values, and supports the character, amenity, form and function of the relevant area*', I disagree that the Proposal will reinforce Ōhoka's rural village identity. While landscape planting, ecological restoration and open space provision are positive features, these measures alone do not determine character. There is insufficient evidence that the proposed built form, village centre and public realm will deliver the character outcomes illustrated in the Masterplan, particularly given the limited mitigation measures and project-specific urban design controls proposed.

I acknowledge that the Proposal would provide a range of benefits, including additional housing supply and choice within the Ōhoka area, enhanced riparian access and ecological restoration. However, I consider that there are significant uncertainties remaining in regard to strategic urban form, community infrastructure, the function of the village centre, and the ability of the proposed planning framework to secure the urban design outcomes sought through the Masterplan.

Overall, while the Proposal has several positive attributes, I do not consider that the information provided demonstrates that development of this scale will achieve a well-functioning urban environment or is acceptable from an urban design perspective. The key issues of strategic alignment, character, connectivity and accessibility, provision of community services and integration and deliverability remain insufficiently resolved.

In addition, I am not persuaded that the urban design evidence demonstrates benefits of a scale or nature that would be regarded as regionally significant. From an urban design perspective, regionally significant development would typically reinforce the broader settlement pattern, support strategic growth objectives, improve connectivity and accessibility at a district scale, integrate with existing centres and public transport networks, and contribute to a more efficient and resilient urban structure. The Proposal appears primarily focused on establishing a substantial new residential community in Ōhoka and, based on the information provided, it is not evident that the urban design benefits extend beyond the local scale or that they materially advance the broader strategic functioning of the Waimakariri settlement network.

2. INTRODUCTION

2.1 Overview and Proposal

I have been asked by Waimakariri District Council ('WDC') to carry out a peer review of the urban design matters relating to the Ōhoka Fast Track Substantive Application that has been lodged with the EPA on 19 June 2026.

The Proposal comprises a subdivision and development of a 154 hectare site adjoining the settlement of Ōhoka. The site is located between Mill Road, Bradleys Road and Whites Road (the 'Site'). The Site is zoned Rural Lifestyle Zone within the Partially Operative Waimakariri District Plan (Appeals Version). The Proposal comprises 'approximately' 856 residential lots ranging in size from 425sqm to 4,013sqm and a commercial area of 1.49ha along Whites Road opposite the Domain. The Proposal also includes a retirement village of

up to 250 units, a polo ground and a network of roads, reserves, waterways and associated infrastructure.

Conditions are proposed which draw upon the General Residential, Large Lot Residential, and Local Centres zones of the Partially Operative District Plan, noting exceptions in relation to retail maximum gross floor area up to 9,000sqm and RDA for a retirement village under the General Residential Zone with removal of the building coverage provisions.

2.2 Approach to Peer Review and Documents Considered

This peer review evaluates the adequacy of the UDA in relation to:

- Whether the Proposal has taken into consideration the relevant Site and context;
- Whether the relevant Urban Design issues and considerations have been addressed and the assessment has correctly interpreted the nature of the urban design effects;
- Whether the assessment has considered the relevant statutory and non-statutory considerations from an urban design perspective;
- Reaches findings that are supportable from the available information; and
- Whether appropriate urban design mitigation measures are identified.

This memorandum has been structured to respond to the FTAA Panel's Minute 1. The urban design matters most directly relevant to Appendix 4 of the Panel Minute are item 1 in relation to strategic urban form. Given this, the structure of the memorandum is set out as follows:

1. The process;
2. Response to Minute 1 of the Panel;
3. Key issues, areas of disagreement and information gaps;
4. Areas of agreement;
5. Concluding comment; and
6. Recommended conditions.

As part of this review, a site visit was undertaken by the author on 15 May 2026. The author visited the Site and the immediate Ōhoka township and local context. The weather was fine with good visibility.

The following Substantive Application documents have been reviewed in preparation of this Memorandum:

- Fast Track Approval Application, prepared by Novo Group, dated June 2026;
- Appendix 23(a) (updated) – Urban Design Assessment, prepared by DCM, dated 10 September 2026;
- Appendix 23 updated – Urban Design and Landscape Masterplan Rev K, prepared by DCM, dated 10 September 2026;
- Appendix 26 (updated) – Scheme Plan Rev B, prepared by Inovo, dated 10 September 2026; and
- Appendix 43 – Proposed District Council Consent Conditions, prepared by Novo.

I have also reviewed the peer reviews completed by Ms Sue McManaway (Landscape) and Ms Rachael Annan (Reserves and Open Space) and comment on these where relevant.

3. QUALIFICATIONS

I am an Urban Designer and Partner at Boffa Miskell Limited. I have been in this position since 2009. I hold the qualifications of Bachelor of Planning from Auckland University (1994) and a Post Graduate Diploma (Merit) in Urban Design from the University of Westminster (London) (2005). I have 30 years of experience working in Urban Design and Urban Planning in New Zealand, North America and the UK.

I am a registered Urban Designer of the Urban Designers Institute of Aotearoa ('UDIA'). I am a Full Member of the New Zealand Planning Institute. I am a Crime Prevention Through Environmental Design ('CPTED') Practitioner and a member of the Akaroa and Lyttelton Design Review Panels. The role of the Panel is to provide design advice to promote good design and a quality urban environment that expresses the local character and identity of Lyttelton. I am an Approved Urban Design Expert Certifier on behalf of Christchurch City Council.

4. CODE OF CONDUCT

I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This technical review has been prepared in accordance with that Code. In particular, unless I state otherwise, the opinions I express are within my area of expertise, and I have not omitted to consider material facts that might alter or detract from the opinions that I express.

As a member of the UDIA I also abide by the UDIA Code of Ethics. I confirm that I will uphold the dignity of Members and the reputation of the Institute and act in a professional manner to others.

5. THE PROCESS

A Request for further Information (Rfi) in relation to urban design was provided as part of WDC's feedback on the draft application. Following lodgement of the Substantive application, a Completeness Check Memorandum¹ on urban design matters was issued. Following this Appendix 23(a) Urban Design Assessment ('UDA') prepared by DCM was updated. This provides a more comprehensive assessment of the Proposal than the earlier urban design material previously reviewed at the pre-application stage. In particular, the UDA now includes discussion regarding strategic growth considerations, urban form and regional relationships, Crime Prevention Through Environmental Design (CPTED), assessment against relevant subdivision and urban form provisions of the Partially Operative Waimakariri District Plan (POWDP), and a clearer explanation of aspects of the proposed Masterplan. Additional graphics support this further analysis.

¹ The urban design completeness check was prepared by Tim Church, Registered Urban Designer.

The additional information has assisted in further understanding the rationale underpinning the Proposal and has addressed several matters previously identified as information gaps. Notwithstanding these additions, significant areas of professional disagreement remain and there also remains gaps in the urban design reporting. The key remaining areas of concern and information gaps are outlined in the following sections of this memorandum.

6. RESPONSE TO MINUTE 1 OF THE PANEL

The Panel issued Minute 1 on 14 September 2026. This sets out at Appendix 4 the matters on which the Panel particularly invites comment on. Those matters of relevance to urban design include:

1. *Strategic urban form: The relationship of the proposal with the planned settlement pattern under the Canterbury Regional Policy Statement, Greater Christchurch Spatial Plan and district planning framework; and any effects of accommodating substantial urban growth at Ōhoka rather than in identified growth areas.*

Response: The UDA includes an assessment of strategic planning matters, including discussion of the wider settlement pattern, regional growth considerations and the relationship of Ōhoka to Rangiora, Kaiapoi and Christchurch. Notwithstanding this additional material, I remain of the opinion that the assessment does not sufficiently demonstrate that the Site is an appropriate location for growth of the scale proposed or that the Proposal will result in a well-functioning urban environment² from an urban design perspective.

In my opinion, the assessment continues to focus largely on constraints affecting alternative growth locations, rather than demonstrating why this particular site is the most appropriate location for a development of approximately 856 residential lots, a retirement village, a 9,000sqm village centre and associated infrastructure. While the Proposal adjoins the existing settlement, its scale extends well beyond a typical village expansion and would effectively change Ōhoka from an informal rural settlement to a small town. This would substantially increase the population of Ōhoka and materially alter its role and function within the wider settlement hierarchy. In doing so, it results in existing larger lots being incorporated within the new township creating poor urban form relationships by default.

Relevant higher-order planning documents include the National Policy Statement on Urban Development (NPS-UD), Canterbury Regional Policy Statement (CRPS), Greater Christchurch Spatial Plan (GCSP), the Operative and Partially Operative Waimakariri District Plans, and the Waimakariri 2048 District Development Strategy. Based on the strategic direction established within these documents, it is clear that the Site has not been identified

² Policy 1 of the NPS-UD - Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (a) have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households; and
 - (ii) enable Māori to express their cultural traditions and norms; and
- (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
- (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
- (e) support reductions in greenhouse gas emissions; and
- (f) are resilient to the likely current and future effects of climate change.

as a preferred location for growth, does not form part of a planned urban node, or is intended to accommodate development of the scale proposed. It is my opinion that the Proposal would introduce a substantial urban area in a location not anticipated by the strategic planning framework, resulting in a pattern of development that does not, in my opinion, support a compact, integrated and efficient urban form.

DCM contends that development constraints limit growth in Rangiora, Kaiapoi and Pegasus/Woodend/Ravenswood. However, considerable land has already been identified through the District Plan process for urban and rural residential growth adjoining existing settlements with further commentary on this provided by the Council Planner. These locations reinforce the established urban structure and are more consistent with a well-functioning urban environment. I therefore disagree that Ōhoka is well suited to accommodate residential growth of this scale.

While the Applicant concludes that the Proposal supports a well-functioning urban environment, I disagree. The development would be heavily reliant on private vehicle travel, given that most employment opportunities, secondary education facilities, higher-order services and retail activities are located in Rangiora, Kaiapoi and Christchurch. The site is also well beyond a comfortable cycling catchment of key destinations and existing public transport services. While future public transport and park and ride facilities have been contemplated, no scheduled public transport service currently exists and there is no certainty regarding the delivery of such infrastructure.

The urban design implications of accommodating a development of this scale within a small rural settlement have not been comprehensively assessed. In particular, it has not been established that the Proposal would result in an efficient and coherent settlement structure, appropriately relate to surrounding centres, or provide a scale and form of development that is compatible with Ōhoka's existing role, character and function.

Accordingly, while the additional strategic planning discussion is noted, it does not resolve my key concerns in relation to the Proposal's:

- Separation from major employment areas.
- Limited access to existing community / social services and facilities.
- A lack of public transport integration.
- Significant reliance on private vehicle travel.
- A relatively low-density development pattern.
- Questions regarding the efficiency of land use at a regional and district scale.

I acknowledge that the constraints analysis demonstrates the site has the capacity to accommodate urban development without extensive physical intervention and that the Proposal would result in a number of urban design benefits. However, these factors are outweighed by broader concerns relating to settlement structure, accessibility, transport choice, urban efficiency and strategic growth. For these reasons, I do not consider that the Proposal supports a well-functioning urban environment, represents an efficient or integrated pattern of urban growth, or aligns with the strategic growth outcomes anticipated by the relevant planning framework.

7. KEY ISSUES, AREAS OF DISAGREEMENT AND GAPS IN INFORMATION

The key urban design issues and areas of disagreement relating to the Proposal are set out below. Based on the information provided, it is not possible to undertake a comprehensive assessment of all urban design effects or confirm that the Proposal would achieve the outcomes asserted by the Applicant.

7.1 Urban Form and Well-Functioning Urban Environment

This matter is discussed above in Section 6.0.

7.2 Urban Structure and Connectivity

The UDA includes additional commentary regarding the overall urban structure, including walkability and connectivity. While this material assists in understanding the Proposal, I do not consider that the overall urban structure is appropriate for a development of this scale within the Ōhoka context. Notwithstanding my strategic concerns regarding the location and scale of growth proposed, if the Panel considers the site appropriate for urban development, there remain a number of localised context and site-specific urban design matters that I consider require further attention.

Density - In relation to density distribution and supporting a walkable catchment approach, while a density gradient is referenced within the UDA, that gradient is not consistently reflected in the spatial structure of the Masterplan. For example, smaller lots remain distributed throughout areas of the development that are not immediately proximate to the village centre, including Stage 9. The Proposal contains extensive areas proposed to be zoned General Residential Zone, with only limited Large Lot Residential development. As a result and taking into consideration Objective SUB-01 (Subdivision Design) and Policy SUB-P3 (sustainable design) and also raises concerns in relation to SUB-P2, which seeks allotment sizes and dimensions that support the intended pattern of development, I do not consider that the density distribution has been optimised to support a compact and walkable urban form, with substantial areas of open space and other non-residential land uses extending the distance between residential neighbourhoods and the village centre.

Defensible Urban Boundary - The UDA does not address the concept of a defensible urban boundary. In my opinion, the stream corridors provide a clearer, more logical and enduring landscape and urban structure elements that could establish a more recognisable edge to urban development. Extending development beyond these stream corridors weakens this function and creates uncertainty regarding the future urban extent of Ōhoka. The alignment of development with the existing stream network would, in my view, provide a more coherent urban form (albeit still not fully defensible) and better respond to established urban design principles relating to settlement containment and growth management.

Layout and Connectivity - The Proposal continues to exhibit a predominantly inward-focused development and elements of a curvilinear urban structure, characterised by loop roads, lengthy blocks and a limited number of direct north-south connections between the different neighbourhoods. While the stream corridors could provide an attractive landscape

setting and have potential to contribute positively to amenity and ecological outcomes, they also have the potential to act as barriers to north-south movement. The UDA does not adequately demonstrate how these barriers will be overcome, particularly given the lack of clarity regarding the location, timing and public accessibility of pedestrian and cycle bridges. Based on the information provided, it is not possible to determine the extent to which the proposed walking and cycling network will provide direct, convenient and legible connections throughout the development (noting the shared path network sits along Whites Road). As a minimum the scheme plan should include all pedestrian/cycle bridge structures and be factored into the staging strategy. In addition, there is no consideration given to the potential of how this development could provide future connectivity to the south if the Proposal was to eventuate.

I remain concerned that the location of the retirement village, polo ground and stormwater basin areas collectively reduce permeability and create separation between the residential neighbourhoods and the proposed village centre, matters of relevance under Policy SUB-P4, which seeks effective integration with existing development and multi-modal transport connections, including pedestrian and cycle linkages. Rather than reinforcing a highly connected and integrated neighbourhood structure, these land uses have the potential to constrain direct pedestrian movement, fragment accessibility, and diminish the effectiveness of the walkable catchment by limiting the extent to which residents can conveniently access the village centre and other key destinations on foot.

In terms of the location of the village centre, while locating it opposite the Domain will provide urban design benefits, I disagree with DCM that the centre is small scale. Its proposed extent of 9,000sqm appears disproportionate to the size of the settlement following development and in the context of other comparable communities, such as West Melton (discussed further by the transport and economic experts). I also question whether the scale and function of the proposed centre is consistent with the role and function anticipated by Policy SUB-P1, which specifically directs subdivision design to support the character, amenity, form and function of the relevant area. I acknowledge that a centre of this scale may provide opportunities for additional local employment, reduce some trips to higher-order centres, and potentially support future public transport services. However, from an urban design perspective, a centre of this scale also has the potential to alter the established hierarchy of centres, attract a wider catchment of users, and result in a built form and intensity of development that extends beyond that typically associated with a local centre serving day-to-day needs. Further, the village centre is directly adjoined by stormwater basins and the retirement village, which limits opportunities for active edges and reduces the effectiveness of the surrounding walkable catchment. Greater activation around the centre would better support the proposed village square and greenspace. As currently proposed, it is unclear how these spaces will achieve an appropriate level of passive surveillance, given their location behind the retail frontage and adjacent to stormwater basins and areas of car parking.

I concur with Ms Annan that the open space network lacks a clear and legible structure. Rather than being integrated as key elements of the subdivision layout, many neighbourhood parks appear to occupy residual spaces, edge locations, private land or dual-purpose areas. I concur with Ms Annan that the Proposal appears to rely on the Ōhoka Domain to provide functions that would typically be expected within the subdivision's own reserve network.

More broadly, questions remain regarding whether the Proposal will support genuine transport choice and reduce dependence on private vehicles. While opportunities for internal walking and cycling are proposed, residents will continue to rely on travel outside Ōhoka to access most employment opportunities, secondary education, health services, higher-order retail and community facilities. Although potential future public transport infrastructure is discussed, there is currently no scheduled public transport service and no certainty that such services will be delivered. As discussed earlier, the site is well beyond a practical cycling distance to key destinations and existing public transport services. As a result, future residents are likely to remain heavily reliant on private vehicle travel.

DCM undertakes a detailed assessment against the subdivision and urban form provisions of the Partially Operative Waimakariri District Plan, including SUB-O1, SUB-O2, SUB-P1, SUB-P2, SUB-P3, SUB-P4 and SUB-P6. While I acknowledge the analysis provided, I reach different conclusions in relation to a number of these provisions. In particular, I do not consider that the Proposal demonstrates an integrated pattern of land use and development anticipated by SUB-O1, achieves an efficient and well-connected transport and movement network anticipated by SUB-O2 and SUB-P4, or supports the pattern of development and compact urban form anticipated by SUB-P2 and SUB-P3. Similarly, for the reasons outlined later in this assessment, I am not persuaded that the Proposal adequately responds to the design, amenity, character and functional considerations contemplated by SUB-P1.

Given the above, I am not persuaded that the proposed urban structure represents an efficient, integrated and well-connected pattern of development. The Proposal relies on a series of neighbourhoods separated by significant open space, stormwater and other land uses, resulting in a level of fragmentation that, in my opinion, undermines accessibility, permeability and the effectiveness of the walkable catchment.

7.3 Character and Built Form

The UDA includes additional discussion regarding landscape character, village identity and the way the Proposal is intended to respond to Ōhoka's existing character. While this additional information is noted, my key concerns remain unresolved. In particular, I disagree with the conclusion that the Proposal will reinforce and enhance Ōhoka's rural village character, as the UDA continues to focus predominantly on landscape character, visual mitigation and ecological enhancement rather than the urban form and built character outcomes that will ultimately define the development.

The Proposal would introduce approximately 856 residential lots, up to 250 retirement units, commercial centre, extensive road network and associated urban infrastructure, resulting in a substantial increase in urban scale relative to the existing settlement. While the UDA concludes that this development will reinforce the village character, it also acknowledges a transition from an open pastoral landscape to a significantly more developed urban environment. In my opinion, the key issue is not whether the Proposal can be successfully landscaped, but whether the resulting development will be perceived as an extension of a rural village or as a conventional suburban subdivision within a landscaped rural setting.

A fundamental concern is that the UDA relies heavily on landscape buffers, riparian planting, street trees and ecological restoration to support its character conclusions. While these

elements may contribute positively to visual amenity, they do not in themselves define urban character. Character is also shaped by built form, density, urban grain, architectural expression, public realm quality and the relationship between buildings and streets. These matters have received limited analysis, and it remains unclear how the character outcomes illustrated in the UDA graphics will be achieved through the underlying planning framework.

I concur with Ms Annan and Ms McManaway that screening should not be confused with integration. The Proposal relies heavily on planting to mitigate the effects of its scale and density, rather than achieving integration through subdivision structure, layout and built form. Landscaping may reduce visibility, but it cannot substitute for an appropriate development form. I also agree with Ms Annan that the visualisations present a heavily vegetated outcome that is unlikely to be achieved through the proposed planning framework. The extent of tree planting illustrated appears significantly greater than what could realistically be secured through the proposed provisions and Ms McManaway comments further on this.

Although the UDA states that future development will reflect Ōhoka's rural vernacular, there is no detailed urban design framework, design guidance or architectural controls to demonstrate how these outcomes will be delivered. DCM describes Ōhoka as a quaint settlement with a pleasant and quiet atmosphere and notes that variation in built form, scale, character, form and materiality contributes to its sense of place. However, there is limited analysis demonstrating how these characteristics have informed the proposed built form outcomes, and no project-specific built form controls capable of securing the outcomes relied upon in the assessment. The proposed conditions largely defer development outcomes to the underlying residential, local centre and recreation zone provisions, with limited additional urban design controls. I do not consider that these provisions will achieve the outcomes depicted in the Masterplan and UDA or achieve consistency with Policy SUB-P1 or the Character principle of the Urban Design Protocol. While DCM concludes that the Proposal responds positively to SUB-P1 through landscape treatment, open space and waterway integration, I consider that Policy SUB-P1 requires a broader assessment of character, amenity, form and function. In my opinion, achieving consistency with SUB-P1 in the context of a substantial expansion of a rural village requires more than landscape mitigation. In my opinion, it requires a demonstrably distinctive built form, public realm and subdivision structure that reinforces Ōhoka's existing identity and sense of place. This could be achieved by way of an additional character 'overlay' approach in seeking to achieve an integrated outcome that builds upon the existing character valued by the existing community.

There is little information regarding the anticipated built form outcomes for the retirement village. This is notable because removal of the building coverage standards for the Retirement Village as outlined in Condition 7³ potentially allows a relatively intensive built form outcome, yet there are no accompanying built form controls in relation to height and massing. Similarly, the village centre is relied upon as a key contributor to local identity and sense of place, yet there are no specific requirements relating to public realm activation, pedestrian priority, materials, built form or parking behind shops. In addition, there is no discussion of the 12m height limit enabled under the zone and if this is appropriate in the Ōhoka context.

³ Condition 7 should clearly state that it relates to the Retirement Village Lots and not the broader residential areas.

I remain concerned that cultural expression and mana whenua values have not been acknowledged or integrated into the process and urban design framework or associated consent conditions. Given the scale and significance of the Proposal, there is limited evidence of how cultural narratives, local identity and Te Ao Māori design values will be expressed through the urban structure, public realm, open space network or key destination spaces.

In summary, while a range of design aspirations are described, based on the information provided I do not consider it has been demonstrated that these outcomes will be secured through the proposed planning framework. Given the scale of development proposed and its extension beyond the existing settlement, I consider that maintaining and reinforcing Ōhoka's rural village identity requires an approach that exceeds the outcomes typically expected from a standard greenfield residential development. In my opinion, the Proposal should clearly demonstrate how it will deliver a distinctive built form and public realm response that reinforces the village character of Ōhoka. Based on the information provided, I am not persuaded that the resulting urban form and built character will achieve this outcome, or that the character attributes relied upon in the assessment can be consistently delivered over time.

7.4 Open Space and Community Infrastructure

While the UDA places significant emphasis on the quantity of open space proposed, including approximately 24 hectares of blue green infrastructure, I remain concerned that insufficient attention has been given to the quality, functionality and community role of these spaces. A substantial proportion of the open space network appears to be associated with stormwater management, riparian corridors and ecological restoration. While these are positive outcomes, they should not necessarily be equated with functional recreation reserves or community destinations, and there is limited assessment of how these spaces will support day-to-day recreation, social interaction and place-making outcomes. Ms Annan discusses these matters in more detail.

I also remain unconvinced about the role of the proposed polo ground as a community asset. While it is presented as a publicly accessible destination and identity-forming feature, it remains privately owned and is centred on a specialist recreational activity. It is unclear to what extent it will function as publicly accessible recreation open space for residents or contribute meaningfully to community life. Its size and location also have the potential to create separation between neighbourhoods unless permeability, public access and integration with the wider movement network are carefully managed. In addition, the limited passive surveillance of the grounds raises potential CPTED concerns.

Similarly, the proposed village square has the potential to provide an important community focal point; however, insufficient information has been provided regarding its design, relationship to surrounding built form and ability to function as a genuine civic heart for both existing and future residents. As outlined earlier, the square appears isolated from adjoining land uses by carparking and stormwater basins. This is further exacerbated by the location of the retirement village.

In terms of providing community and social services that support the day-to-day needs of the local community, such as a medical centre, pharmacy, convenience retail and other local services, the Local Centre Zone is intended to enable a limited range of activities at a scale that primarily serves local residents. The provision of local services is important in supporting a growing population and reducing the need for daily vehicle trips to other centres. There remains limited certainty regarding the nature, scale and composition of activities that may, or may not establish within the centre to meet local day-to-day needs or limit longer commutes for employment.

Overall, based on the information provided, it has not been demonstrated that the proposed open space network, village square and community facilities will adequately support the needs of the future community, or that the broader social and cultural implications of accommodating significant population growth within Ōhoka have been appropriately addressed.

8. AREA OF AGREEMENTS

The following is a summary of the key areas of agreement:

Housing - I agree that the Proposal would provide a wider range of housing opportunities than currently exist within Ōhoka and would increase housing supply within the District. The inclusion of a variety of residential lot sizes and a retirement village has the potential to broaden housing choice for different household types and life stages. Housing would be enabled as part of a comprehensive masterplan. However, the key difference between our opinions is the appropriateness of the overall scale, density and form of residential growth proposed, and that insufficient analysis has been provided to demonstrate that these outcomes are consistent with the broader strategic planning framework.

Commercial offering - I agree that the provision of local commercial activities has the potential to provide benefits to both existing and future residents by improving access to some goods and services and contributing to a local focal point for the community. However, the key difference between our opinions is the uncertainty regarding the nature, scale and composition of the retail and commercial offer, and therefore the extent to which it could meet the day-to-day needs of residents or reduce the need to travel to larger centres, with no specific provisions outlined.

Open space and riparian access - The Proposal would deliver new publicly accessible open space, riparian corridors, reserves, landscape planting, and shared path connections, which are considered positive outcomes from both an urban design and environmental perspective. The incorporation of waterways as defining elements of the Masterplan is a particular strength, providing opportunities for enhanced visual amenity, recreation, and connectivity. However, the key difference between our opinions is the functionality and usability of these spaces, including the extent to which they will meet community needs and provide genuinely convenient and meaningful access across the riparian corridors.

Visual amenity and landscape - I agree that future residents are likely to experience a good level of visual amenity, supported by the extensive landscaping and waterway corridors proposed, albeit the level of landscape appears misleading. The key difference between our

opinions is that positive landscape outcomes alone are not sufficient to demonstrate that the Proposal's urban form, built character, and place-making outcomes are appropriate.

Active modes - I agree with the objective of creating a walkable and cycle-friendly local environment and acknowledge that the Proposal incorporates a pedestrian and cycling network, including a shared path that sits along Whites Road. However, the key difference between our opinions is the effectiveness of the proposed layout in achieving these outcomes.

Change in character - I agree with the UDA's acknowledgment that the Proposal will result in a substantial change from the Site's existing open rural and agricultural character to a more urbanised and developed environment. The key difference between our opinions relates to the magnitude and acceptability of effects, and whether the resulting urban form can appropriately be characterised as an extension of Ōhoka's existing rural village character.

9. CONCLUSION

I agree that the Proposal incorporates a number of positive urban design outcomes, particularly in relation to integration of waterways within the masterplan and provision of greater housing choice locally. I acknowledge that the additional information provided has assisted in clarifying aspects of the Proposal and the urban design rationale underpinning it. However, the Proposal remains a substantial urban expansion of Ōhoka, comprising approximately 856 residential lots, a 250 unit retirement village, commercial centre and associated infrastructure. The Proposal would introduce a scale of development that extends well beyond the existing role and function of Ōhoka, fundamentally changing its character and position within the wider settlement network.

While the UDA concludes that there are no adverse urban design related impacts anticipated which reach the threshold for consideration under s85 of the FTAA 2024, I am not satisfied that this is the case. While the additional information has addressed some matters, considerable uncertainties remain regarding strategic urban form, connectivity and accessibility, the function and integration of the village centre, the relationship between landscape outcomes and built form character, the provision of community infrastructure, and the extent to which the anticipated urban design outcomes can be secured through the proposed planning framework. Given this, the key points of disagreement remain that I do not consider that:

- The proposed urban structure is appropriate in strategic planning terms;
- The proposed density, scale and built form are compatible with Ōhoka's rural village character and identity;
- The layout will achieve a highly connected, permeable and accessible urban environment;
- The village centre will function as an effective focal point for the community;
- The Proposal will reduce reliance on private vehicle travel; and
- The urban design outcomes relied upon in the UDA can be secured through the proposed planning framework and consent conditions.

While I acknowledge the potential benefits identified in the UDA, based on the information provided I am not persuaded that the Proposal will achieve the urban design outcomes relied upon in the assessment. In particular, I do not consider that it has been demonstrated that the Proposal would deliver an efficient and integrated pattern of growth, an appropriate response to the role and function of Ōhoka, or the connectivity, accessibility and character outcomes asserted by the Applicant. For the reasons outlined above, I disagree with DCM's conclusions in relation to SUB-O1, SUB-O2, SUB-P1, SUB-P2, SUB-P3, SUB-P4 and SUB-P6. In my opinion, the Proposal has not demonstrated an integrated and efficient pattern of development, appropriate connectivity and accessibility outcomes, or a form of development that appropriately responds to the role, function and character of Ōhoka. In addition, it is unclear whether the urban design benefits identified extend beyond the immediate locality to a degree that would materially contribute to the broader public benefits assessment under the FTAA 2024.

10. CONDITIONS OF CONSENT

I have reviewed **Appendix 43** which outlines the recommended subdivision and land use consents. As discussed, there are limited conditions that directly secure urban design or built form outcomes. In addition, and as outlined earlier, the Proposal relies on an existing set of District Plan provisions which I do not consider fully align with the design outcomes sought.. No place-specific controls relating to built form, village centre design, neighbourhood character or public realm quality have been proposed.

As such, should the Panel consider that the Proposal is regionally significant, the following conditions are considered appropriate from an urban design perspective.

Residential Design

1. Prior to the grant of consent, establish specific built form and character design standards across the residential areas that would together result in a character and amenity appropriate to the Ōhoka context. This should be achieved through the preparation of additional analysis and graphic material. The conditions should cover the specific built form standards and character requirements for the retirement village development, including height, bulk and massing.
2. The suite of conditions should include but not be limited to: height, coverage and setbacks; architectural character and building materials; potential housing typologies; frontage design and streetscape and public realm interfaces to support passive surveillance; garage location and measures to avoid garage dominance; and landscaping and planting requirements.

Village Centre

3. Prior to the grant of consent, establish specific built form and character design standards for the village centre that would result in a character and amenity appropriate to the Ōhoka context and achieved through the preparation of additional analysis and graphic material, taking into account the role and function of the centre as a pedestrian-orientated local centre.

4. The suite of conditions should include but not be limited to: height, setbacks; architectural character/form and building materials; cultural values and narrative, active frontage treatment; verandahs; landscaping and public realm design; pedestrian and cycle connections; vehicle access, servicing and parking arrangements. Clarification should also be provided in relation to any specific commercial floor area requirements.

Public Realm and Landscape Plan

5. Include identification of the pedestrian/cycle bridge locations across the streams within the Scheme Plan.
6. As part of the approval of the subdivision stage, detailed landscape and public realm plans shall be prepared by a suitably qualified landscape architect and approved by the Council. The plans shall include:
 - a. Detailed landscape design for all streets, public open spaces, reserves and riparian corridors.
 - b. Street tree planting, hard landscape treatments, furniture, lighting and wayfinding elements.
 - c. CPTED principles and measures to support passive surveillance and user safety.
 - d. Provision of public art.
 - e. Recognition and incorporation of relevant cultural narratives and place-making opportunities.
 - f. Integration of stormwater and ecological design components where appropriate.
 - g. Identification of staging requirements for landscape implementation.