

Before the Independent Hearings Panel  
At Central Otago District Council

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| Under the        | Resource Management Act 1991 ( <b>RMA</b> or <b>Act</b> )                                                                                                                                      |
| In the matter of | an application for subdivision and land use consent to establish another 44 residential allotments in the rural resource area at 112 & 144 Ripponvale Road, Cromwell (RC250155 and RC220396v3) |
| And              | <b>New Zealand Cherry Corp (Leyser) LP</b><br><br>Applicant                                                                                                                                    |

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**Evidence Summary of Jacob (Jake) Paul Woodward (Planning)**

7 August 2026

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**Applicant's solicitor:**

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**anderson  
lloyd.**

## Introduction

- 1 My name is Jacob (Jake) Paul Woodward.
- 2 I prepared a brief of evidence dated 23 July 2026 addressing planning related matters in relation to the Application.
- 3 My qualifications and experience are set out in that statement of evidence.

## Key issues and conclusions

- 4 A full description of the Proposal is set out in my primary evidence. In brief, this Proposal seeks a suite of resource consents to vary the approved Shannon Farm subdivision development by increasing the residential yield from 160 to 204 allotments through the reconfiguration of later stages of the development.
- 5 For the most part, there is considerable agreement between myself and **Mr Monthule-McIntosh** in relation to the majority of technical matters of the Proposal. In particular, there is no material dispute that the Proposal can be appropriately serviced and that effects relating to transport, infrastructure, ecology, productive land, heritage, natural hazards and reverse sensitivity are either less than minor or can be appropriately managed through conditions of consent.
- 6 The principal issues between us are confined to landscape and rural character effects, the interpretation and application of the Rural Resource Area (5) policy framework, and the relevance of the National Policy Statement on Urban Development 2020 (**NPS-UD**).
- 7 In relation to landscape effects, I note there is broad agreement between the landscape experts that the proposed intensification within RLAs 3 and 4 would result in no more than minor landscape and visual effects. The only substantive disagreement relates to RLA6. I prefer the evidence of **Mr Milne**, who concludes that the Proposal maintains the defining values of the SAL which were determined through conferencing between **Mr Milne** and Council's appointed landscape architect for Plan Change 14. I agree with **Mr Milne's** assessment that the Proposal will not change the legibility of the landform by confining development to the lower slopes and avoiding the No Build Area, maintaining the balance land as open pasture, and continuing to apply the established controls on building platforms, planting, fencing and built form. In my opinion, the emphasis should remain on whether the values of the SAL are maintained, rather than simply whether additional allotments are proposed.

- 8 I disagree with **Mr Monthule-McIntosh's** assessment of rural character effects. While the Proposal increases residential density, it continues to achieve the graduated pattern of development intended through Plan Change 14, with the larger allotments remaining on the more elevated and visually sensitive parts of the site. Viewed from outside the development, Shannon Farm will continue to read as a cohesive, master-planned rural lifestyle development, while any increased density will largely be experienced internally by future residents who knowingly choose to live within that environment. In my view, the Proposal responds to contemporary expectations of rural lifestyle living without fundamentally altering the overall character of the development.
- 9 In terms of the relevant policy framework of the District Plan, there is considerable agreement between myself and **Mr Monthule-McIntosh** in relation to provisions relating to servicing, roading, open space, recreation, productive land, reverse sensitivity, ecology, heritage and natural hazards.
- 10 A fundamental point of difference between **Mr Monthule-McIntosh** and myself is the interpretation of, and assessment of the Application against, Objective 4.3.10 and Policy 4.4.18. In my opinion, these provisions are fundamentally outcome-focused. The minimum allotment sizes and density provisions are planning mechanisms intended to achieve broader environmental outcomes, rather than ends in themselves. Those outcomes are defined in the policy framework. While the Proposal departs from those mechanisms (by breaching Lot sizes and Lot numbers), it continues to achieve the outcomes sought by those key provisions of the District Plan, particularly Objective 4.3.10, by protecting the ONL, maintaining the values of the SAL, retaining productive land, providing rural amenity, managing reverse sensitivity, and relying on existing/proposed infrastructure framework established through Plan Change 14. I consider **Mr Monthule-McIntosh** places considerable emphasis on the Proposal's departure from the subdivision pattern and allotment size framework established through PC 14, rather than assessing whether the environmental outcomes sought by Objective 4.3.10 continue to be achieved.
- 11 I consider insufficient weight has been given to the many components of Policy 4.4.18 that the Proposal clearly achieves. **Mr Monthule-McIntosh's** assessment focuses primarily on the density provisions and the treatment of RLA6, whereas the Proposal remains consistent with the wider direction of the policy by providing an integrated subdivision pattern, protecting landscape values, retaining open space, managing infrastructure and servicing, avoiding the No Build Area, maintaining productive land, and providing an efficient and coordinated development outcome. In my opinion, although the Proposal departs from certain aspects of the policy

as it relates to a reference to being in accordance to the Structure Plan or allotment sizes, it cannot fairly be characterised as being contrary to the policy when considered as a whole and in light of the objective that it seeks to address (4.3.10 in particular).

- 12 I disagree with **Mr Monthule-McIntosh's** conclusion that the NPS-UD is not relevant. Relying on the evidence of **Mr Colegrave**, I consider Cromwell is appropriately regarded as a Tier 3 urban environment and that Shannon Farm forms part of that wider urban environment as defined by the NPS-UD, notwithstanding its rural lifestyle character. The NPS-UD is relevant in that the Proposal directly responds to the NPS-UD's enabling direction by increasing housing choice, responding to demonstrated market demand, making efficient use of infrastructure already established through Plan Change 14, and provides additional development capacity, which is considered to have no more than minor adverse environmental effects.
- 13 The evidence of **Mr Colegrave** and **Mr Croft** demonstrates that market conditions have evolved considerably since Plan Change 14 was approved. While the Structure Plan inserted in the District Plan reflected the best information available at that time, there is now strong and demonstrable demand for smaller rural lifestyle allotments within Shannon Farm. In my opinion, the Proposal represents a logical evolution of the consented development that responds to changing community needs while continuing to deliver the environmental outcomes envisaged through the Rural Resource Area (5) policy framework.
- 14 Overall, I consider the section 42A Report places disproportionate emphasis on the Proposal's departure from the original subdivision pattern established through Plan Change 14, rather than assessing whether the environmental outcomes sought by the District Plan continue to be achieved.
- 15 When the Proposal is considered in light of the expert landscape evidence, the economic evidence, the enabling direction of the NPS-UD, and the objectives and policies of the planning framework as a whole (not just specific provisions of the District Plan, but all of the District Plan, as well as the Regional Policy Statement and National Policy Statements collectively), I conclude that the Proposal represents a well-planned and appropriate evolution of Shannon Farm. Accordingly, I do not agree that the Proposal is contrary to the District Plan or that the identified effects justify declining consent.

Dated this 7 August 2026  
**Jacob (Jake) Paul Woodward**

