

APPENDIX A

Response to Prelim s42A

MEMORANDUM REPORT: PTDP – Hearing G – Response to RFI

To: Timaru District Council

Applicant: Submitter 227 – Westgarth and Gibson

From: Davis Ogilvie (Aoraki) Ltd

Date: 10 March 2025

Subject: Response to Hearing G Preliminary s42A report

1 INTRODUCTION

This memo has been prepared in response to the Preliminary s42A report prepared by Matt Bonis in October 2024, and subsequent clarification provided by Council and its representatives in the months since.

In his preliminary report, Mr Bonis identifies the purpose and scope of his report, and acknowledges the need described by Panel Minute 6, for more time for assessment and reporting than usual.

In his report, Mr Bonis identifies the information required and detailed this in a checklist for submitters (**Appendix 1**) to respond to. In addition to the general checklist, the following additional information is sought:

- a) The existing environment, including configuration and fragmentation of titles and geophysical boundaries that would delineate the requested zone boundaries.
- b) Application of the requirements of the NPS-HPL, specifically for Sub No. 227.1 Gibson (as it relates to the extended area related to this submission)
- c) Application of requirements in the NPS-UD especially in terms of development capacity beyond 'at least sufficient development capacity' for the purpose of Policy 2, and implications for integrated infrastructure and funding decisions (Objective 6).
- d) Consideration against the relevant statutory framework for achieving a consolidated pattern of development (as required by the CRPS and notified PDP) for all submissions listed, which includes the provision of a 'coordinated pattern of development' including implications for amending timeframes associated with SCHED-15
- e) Service provision as set out in Attachment B.

Since the original submission, Council have commissioned technical work and assessments for the preparation of the Development Area Plan (ODP/DAP) for FDA areas 1, 2 and 4. **Council's draft DAP** is contained in **Appendix 3** which will be referenced throughout this document. Other technical work may also be referenced in individual sections below.

2 SITE CONTEXT

The subject site is located at 82 Kellands Hill Road, Timaru, at the northern extent of Timaru's urban environment (as shown in **Figure 1 – 4** below). The subject site is intersected by multiple waterways (Oakwood Stream and Washdyke Creek to the North and Taitarakihi Creek to the south). The underlying zoning of the site is General Rural (GRUZ) under the Proposed Timaru District Plan, and part of the land is included within Future Development Areas 4 and 1 (FDA4 and 1) as show in **Figures 1 – 4** below.

Overall, the submitter is supportive of the Proposed Timaru District Plan (PTDP), as it relates to their site, and in particular the recognition that the southern portion of the site is suitable for urban development. However, the submitter seeks two changes to the FDA areas as mapped under the Proposed Timaru District Plan (PTDP), as outlined below:

1. An immediate rezone from GRUZ to GRZ, as it relates to FDA1. The PTDP was publicly notified on 22 September 2022, and since then Council has prepared a draft **Development Area Plan (DAP)** covering the site, based on initial technical investigations and reports. Also refer to **Appendix 3**;
2. To amend the common boundary of FDA1 and FDA4, and additionally move the boundary for FDA4 further north. The suggested changes to the FDA boundaries are to better coincide with natural features, land use and future development feasibility. **Figure 5** below shows the proposed changes.

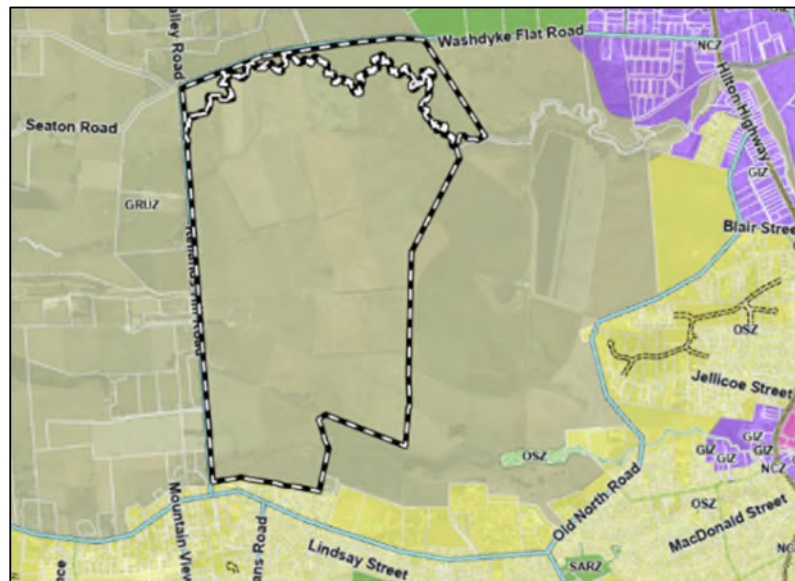


Figure 1: Proposed Timaru District Planning Maps, showing relevant zoning.



Figure 2: Proposed Timaru District Planning Maps, showing FDAs within the site.



Figure 3: Proposed Timaru District Planning Maps, showing FDA1 and its relationship to FDA4



Figure 4: Proposed Timaru District Plan Planning Maps, showing relevant overlays, including Flood Assessment Area, SASM-3 & 13, Esplanade Provision, Public Access Provision and Versatile Soils. The area of the site subject to versatile soils overlay is also classed LUC 2 land. The site also contains LUC 3 Land.

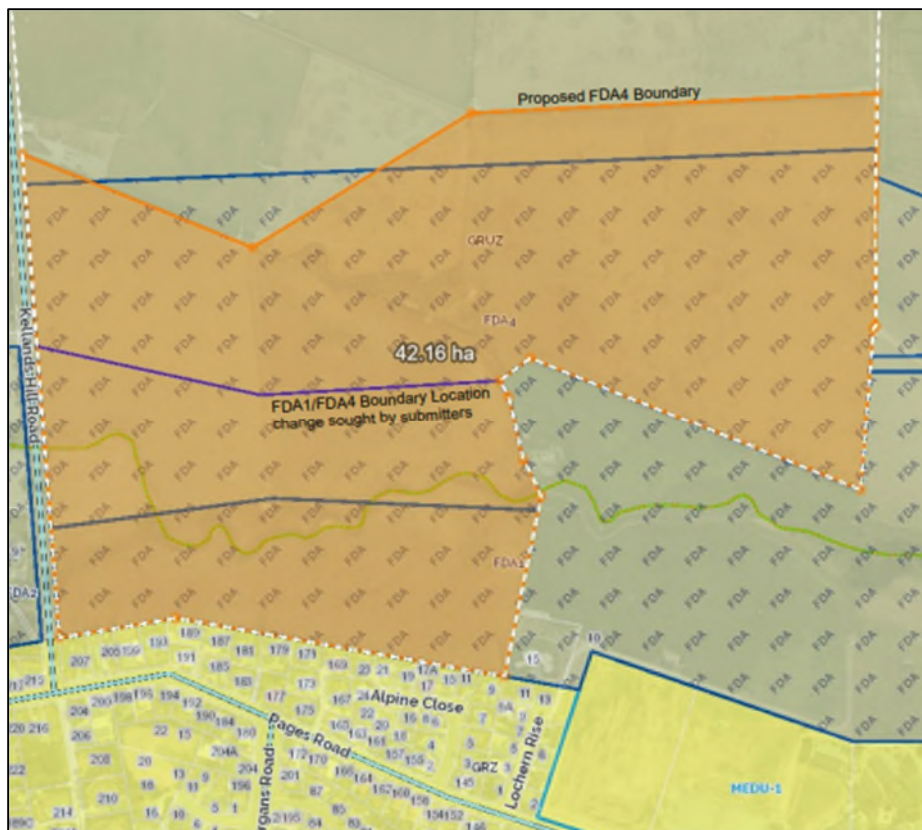


Figure 5: Submission sought the above changes to the proposed boundaries of FDA1 and FDA4

3 ASSESSEMENT

NPS-UD

Question 1: *What is the contribution of the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) in terms of the provision (residential / rural lifestyle – yield, density; and business - area) in relation to the Council's provision of 'at least' sufficient development capacity (**Policy 2**) given the Property Economics analysis (**Section 8**)?*

Neither the **National Policy Statement on Urban Development (NPS-UD)** nor the **Canterbury Regional Policy Statement (CRPS)** explicitly **require a minimum yield** for residential development. However, both policies encourage increased housing supply and density, which can indirectly influence yield expectations.

NPS-UD (National Policy Statement on Urban Development)

- The NPS-UD **requires councils to enable greater housing density**, although this is primarily targeted at Tier 1 urban areas like Auckland, Wellington, Christchurch, and Hamilton; through '**General Compliance**', Tier 3 councils must also ensure their district plans align with the NPS-UD objectives, promoting well-functioning urban environments, so consideration of housing density is still important and requires some flexibility. The Planz -2022-GMS report, also stated this:

The NPS-UD places greater expectations on Tier 1¹ and 2² Councils, but Tier 3³ (which includes Timaru) local authorities are strongly encouraged to do the things that tier 1 or 2 local authorities are obliged to do under Parts 2 and 3 of this National Policy Statement, adopting whatever modifications to the National Policy Statement are necessary or helpful to enable them to do so⁴.

So Council have a 'choice': which is an important reminder in the context of placing such significant weight on the Property Economics analysis and planning by the rear vision mirror (i.e. reliance on historical census data). Council are in fact 'strongly encouraged' and should 'adopt whatever modifications' they consider necessary, this can mean taking a more aspirational vision for our district implemented with suitable controls.

- While it does not **set a mandatory minimum yield**, it promotes **higher-density zoning and greater housing capacity**, giving Councils the opportunity to set/consider their own yield expectations in district plans. This provides Council with the ability to consider local contextual information, such as topography and housing typology demands that might influence yield. In this instance and relevant to the consideration of whether Council is providing for 'at least' sufficient development capacity we feel that the Property Economics report has potentially overlooked some of this local context information which results in their analysis potentially over estimating the available capacity. This is largely based on the understanding that within the GRZ zone, a lot size of 450m² has been used in their modelling to determine potential yield.

Considering the requirements of Policy 2 of the National Policy Statement on Urban Development (NPS-UD), the following response evaluates the contribution of rezoning or amendments in timing associated with FDA1 and FDA4 to the provision of sufficient development capacity in Timaru District.

1. Residential Yield and Density

FDA1 and FDA4 Potential Contribution:

- These areas are identified as Future Development Areas (FDAs) under Schedule 15, meaning they are intended to provide additional residential capacity when required.
- Rezoning FDA1 and FDA4 can significantly contribute to residential yield by transitioning rural land into urban zones, enabling residential development and Timaru's urban boundary to logically extend northwards.
- Based on density benchmarks from similar greenfield developments (e.g., Christchurch and other regions), residential yields often range from 12–15 households per hectare, however, unlike large urban centres, local and/or site characteristics such as topography, geotechnical ground conditions, housing typology demands, feasibility of development and demographics play a key role in the likely 'realised' density. Looking in the vicinity of this site, topologies seen directly south of the site (**see Figure 6, below**), demonstrates density/yield at approx. 10HH/ha and looking around Hunter Hills and Meadowstone Street in the Gleniti Development zone density is more like 8HH/ha. Local demand in the vicinity of the submitters site seems to be driven by a need for larger residential section sizes and houses suited to families (Lot sizes 700-1000m²), with a scattering of smaller sections (450-600m²) potentially providing for retirees wanting to live in a higher value area with low maintenance yards. That said, where topography permits, density can be increased if market conditions demand which improves yield. So flexibility is needed and believed to be provided in the rules of the GRZ but the point is how anticipated yield and what has been modelled by Property Economics is affected by these characteristics.



Figure 6: Existing section size and housing typology directly south of the site

- This effect and rationale is demonstrated somewhat in the approach the DRAFT DAP design has taken, where the designers have included a range of typologies/building types, including higher density nodes, apartments and mixed use clusters. This subsequently helps reach a higher overall yield.
- From the DRAFT DAP information, it is difficult to count/determine for sure, however within the submitters FDA1 and FDA4 site boundary, we calculated from DAP Plan: 'Lot Sizes', an estimated yield of around 380-400 lots could be achieved for the site over the life of the plan. This gives a yield of between 9.4 – 10 HH/ha.



Figure 7: DAP Plan showing proposed Lot sizes

- Furthermore, topography and achieving good urban design and environmental outcomes play a significant role in the overall yield also. In this case the rolling topography, desire for reserve and movement connectivity (car, bike, pedestrian), along with improved biodiversity (green belts) and stormwater management require more land than normal to be used for public spaces such as Roads and Reserves. See DAP in **Figure 8** below, with the green areas showing the extent of land required for Roads and Reserves which equates to approx. 20.21ha or 49.7% of the submitter site.



Figure 8: Image of DAP

- These matters do not mean the site is unsuitable for urban growth, rather, through good planning and processes like completing the DAP work, the matters are considered and solutions incorporated within the design to ensure a well-functioning urban environment that is feasible to build and achieves good long term environmental outcomes.
- For the reasons outlined above, FDAs 1, 2 and 4 are a good example of why Council need to treat the Property Economics development capacity modelling for Timaru with caution, as it is understood that 450m² lot size has been used in their modelling assessment (i.e. being the minimum in the GRZ).
- This is supported by the market evidence within the Colliers, 2022 Timaru Residential Property Market Study commissioned by Council, which notes on page 13: *"Of note the average land area of a vacant section is 1,033sqm compared to 784sqm for the average house"*, both being well above the 450m² that seems to have been used. Even using an average of 12 HH/ha, which equates to a lot size of 833m² is substantially larger than 450m², which potentially represents that forecast capacity modelling could fall short by some 46% of projections. Thus putting into question whether 'at least' sufficient supply is being provided for.

Alignment with NPS-UD Policy 2:

- Policy 2 requires councils to provide "at least" sufficient development capacity for both short, medium and long-term housing needs. The Property Economics analysis in Section 8 of the s42A report indicates that current residential capacity exceeds medium-growth projections but falls short under high-growth scenarios.
- Additional information such as the Informetric's study indicates Timaru may have already exceeded the expected population growth as shown below:

<https://rep.infometrics.co.nz/timaru-district/population/growth>

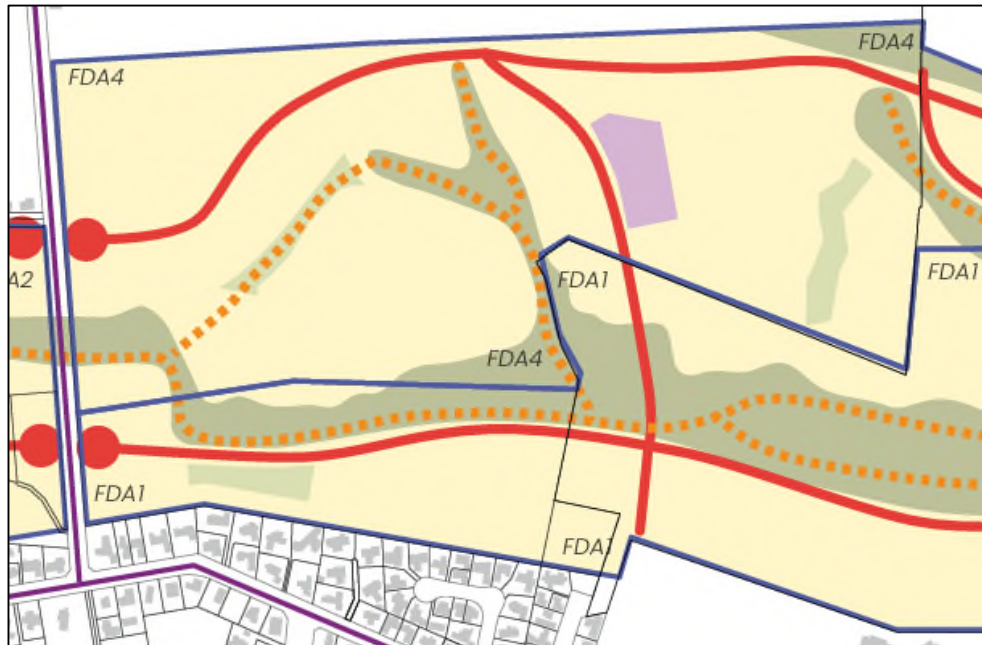
2021	48,500	0.4%	200
2022	48,600	0.2%	100
2023	49,600	2.1%	1,000
2024	50,100	1.0%	500

- Rezoning FDA1 and FDA4 would help address potential future shortfalls under high-growth scenarios, ensuring a buffer for housing demand.

2. Business Land Capacity

FDA1 and FDA4 Potential Contribution:

- While the proposed GRZ is focused on residential development, these FDAs and their geographical location within the context of the existing urban environment could potentially also accommodate mixed-use or business zones/nodes, depending on council priorities. This has been considered by the DRAFT DAP, which shows a potential Commercial node area, highlighted purple on the image below.



- Providing for such local commercial activities that support residential growth can provide 'local' opportunities, reducing reliance on vehicle travel and contributing to well-functioning urban environments.

Alignment with NPS-UD Policy 2:

- Providing sufficient business land is critical for supporting economic growth alongside residential development. If FDA1 or FDA4 includes provisions for business nodes, this would enhance their contribution to balanced urban growth.

Alignment with Property Economics Analysis

- The Property Economics analysis in Section 8 of the s42A report concludes that current residential capacity is sufficient under medium-growth projections but may fall short under high-growth scenarios.
- Rezoning FDA1 and FDA4 would provide additional flexibility to address potential high-growth demands while maintaining a buffer for long-term needs.

Rezoning or amending the timing of FDA1 and FDA4 can contribute meaningfully to Timaru District's ability to meet its obligations under NPS-UD Policy 2 by providing additional residential capacity and potential business opportunities. However, this contribution is contingent upon:

1. Ensuring infrastructure readiness through alignment with council's LTP.
2. Maintaining adherence to Schedule 15 sequencing.
3. Demonstrating alignment with high-growth scenarios identified in the Property Economics analysis.

Question 2: *For residential and business rezonings how would the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) contribute to 'well-functioning urban environments' (**Objective 1** and **Policy 1**) and align with responsibilities of the Timaru District Council to ensure decisions on urban development that affect urban environments are integrated with infrastructure planning and funding decisions (**Objective 6**)?*

Rezoning FDA1 and FDA4 for residential uses can contribute to "well-functioning urban environments" as defined by Objective 1 and Policy 1 of the NPS-UD, and how these rezoning decisions integrate with infrastructure planning and funding in alignment with Objective 6.

a. Addressing Diverse Housing Needs (Policy 1(a)):

- Rezoning FDA1 and FDA4 proactively addresses the *variety* of housing needs within the Timaru community, as emphasized by Policy 1(a) of the NPS-UD.
- While existing assessments (like the Property Economics analysis) may indicate a sufficient number of dwellings, this *does not* guarantee that the *types, prices, and locations* of these dwellings adequately meet the needs of the evolving community, as noted by the Novo Group memo (**Appendix 4**).
- As Timaru's population ages, the rezoning must facilitate the development of a range of housing topologies, including smaller residential units and retirement villages to meet increasing demand. Simultaneously, recognizing the continued demand for standalone homes on larger lots (e.g., exceeding 450m²), the rezoning should provide options for families seeking larger properties, as is evident within the west Timaru area.
- The rezoning, therefore, needs to provide diverse housing options to meet the needs of different household sizes, incomes, and lifestyles. This has been appropriately considered by the Council commissioned DRAFT Development Area Plan work. See **Figure 7** 'Lot Type' DAP Plan snippet below, showing a concept of lot types considered for the submission site:

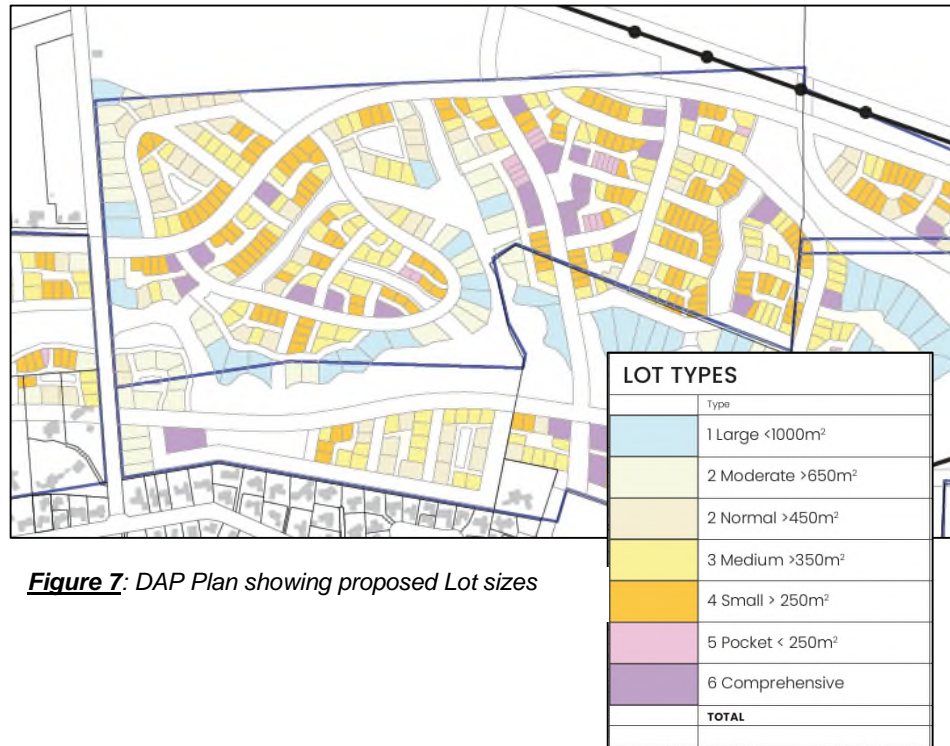


Figure 7: DAP Plan showing proposed Lot sizes

b. Enhanced Accessibility and Connectivity:

- Integrating business and commercial zones within or adjacent to residential areas in FDA1 and FDA4 could also create mixed-use environments that reduce reliance on private vehicles and promote walking, cycling, and public transport use.
- This contributes to a more accessible and connected urban environment, aligning with the NPS-UD's emphasis on efficient transportation networks and walkable neighborhoods. Subsequently in comparison, FDAs 1, 2 and 4 are better located to these networks and Timaru's existing urban environment than FDAs located in the Washdyke area.

c. Promotion of Economic Activity and Employment:

- Including business or commercial zones in FDA1 and FDA4 can support local economic activity and create employment opportunities closer to residential areas. In terms of industrial land supply, Policy 1(b) mandates local authorities to provide sufficient land that meets the varying location and site size requirements of different business sectors. Addressing industrial supply is not part of this submission, but it is worth emphasising that residential development is key to supporting people working in our district so is directly linked to these other land uses. The site is well located to achieve this efficiently, subsequently promoting the economic wellbeing of our community.
- This reduces commuting distances and supports the development of vibrant, self-sufficient communities.

d. Protection and Enhancement of Amenity Values:

- Well-functioning urban environments prioritize the protection and enhancement of amenity values, including open spaces, parks, and natural features.
- Rezoning FDA1 and FDA4 should incorporate these elements to create attractive and liveable communities that enhance the quality of life for residents.

2. Alignment with Integrated Infrastructure Planning and Funding Decisions (Objective 6):

a. Sequencing of Development with Infrastructure:

- Rezoning FDA1 and FDA4 must be carefully sequenced to ensure that infrastructure (e.g., water supply, wastewater, stormwater, and transportation) is planned and funded *before or concurrently* with development. In this instance, as part of the DAP process, a funding model for key infrastructure can be developed including consideration of both Council funding through the LTP and recovery through FCs
- The inclusion of FDA4 improves the anticipated yield, therefore funding becomes more viable when spread over a larger number of new connections to Council's networks
- This aligns with Objective 6 by preventing premature development that could strain existing infrastructure or create environmental problems.

b. Funding Mechanisms and Developer Contributions:

- Appropriate funding mechanisms can be used to support infrastructure upgrades and new infrastructure required to serve FDA1 and FDA4 as well as providing wider public benefit beyond the site. This may involve developer contributions (financial contributions), targeted rates, or other funding sources.
- Objective 6 emphasizes the importance of transparent and equitable funding arrangements to ensure that development contributes to the cost of infrastructure provision.

c. Long-Term Planning and Investment:

- Integrate the development of FDA1 and FDA4 into the Timaru District Council's Long-Term Plan (LTP) to ensure that infrastructure needs are considered in the broader context of regional growth and investment.
- This demonstrates a commitment to Objective 6 by aligning urban development with long-term infrastructure planning and funding priorities and provides an opportunity to help mitigate existing downstream problems.

d. Stormwater Management:

- The integration of high performance and nature-based solutions into stormwater management is essential in mitigating environmental impacts and promoting sustainable urban development.

3. Addressing Potential Shortfalls and Seeking Alternative Approaches (Novo Group Memo):

- The Novo Group memo highlights that simply providing "*sufficient development capacity*" is not enough. *Local authorities must ensure at least sufficient capacity to meet demand across various housing types / land size, locations and price points.*
- If evidence demonstrates that the PDP does not adequately accommodate these evolving needs, the Council will need to consider alternative approaches to address the shortfall.
- This response therefore emphasises the proactive assessment of diverse housing needs within the Timaru community and incorporating these considerations into rezoning decisions.
- Additional options are available for Council to consider such as the option of 'Deferred Zoning' as a means of mitigation for the remaining FDA land or portion of land being requested as a result of the amended FDA1 boundary

Rezoning FDA1 and FDA4 can contribute significantly to creating well-functioning urban environments in Timaru District. Rezoning decisions must address the *variety* of housing needs which we believe exists in our community, not just the overall quantity of dwellings. The success depends on careful planning, robust infrastructure investment, a commitment to integrating urban development with long-term infrastructure planning and funding decisions, and a *proactive assessment and accommodation of diverse housing needs* within the community (understanding local demand). A combination of live rezoning addresses an immediate need and providing for future FDAs or deferred type zoning with controls provides Council the ability to address potential shortfalls, enabling adaptability/response to address those.

This approach ensures sustainable growth that enhances the quality of life for all residents and supports the region's economic prosperity. By prioritising these considerations, the Timaru District Council can effectively balance growth and community needs.

NPS-HPL

Question 3: Urban Rezonings: *Demonstrate consideration and alignment with the requirements of the NPS-HPL **Clause 3.6.** for any submission for an urban rezoning (**GRZ** or **GIZ**) where the exemptions in 3.5(7)(b) are not applicable.*

The clients "subject land" is a mix of LUC2 and LUC3 soils. The portion of land subject to LUC2 soils runs generally parallel to Washdyke Flat Road (approximately 450-500m in width), while the rest of the site is classified as LUC3 as shown in **Figure 4** above. Both FDA1 and FDA4 overlays are located solely within the LUC3 classified soils. While there are no guarantees, at the time of writing, the Government through its "Going for Housing Growth" plan has stated its intention to remove LUC3 from the definition of highly productive land in the National Policy Statement, NPS-HPL. At this stage the submitter is investigating the NPS-HPL as it relates to FDA4, and wishes to retain the right to provide further information as part of the formal response to the final s42a report, if formal changes or direction have been provided by the Government.

There are four distinctive matters of consideration with LUC3 classified soils that are subject to assessment against NPS-HPL, as identified below:

1. FDA1: The Plans Memorandum, prepared by Matt Bonis to the Timaru District Council, confirms that FDA1 (overlay as notified) is not considered to be Highly Productive Land under Clause 3.5(7).
2. FDA4 (overlay as notified): The Plans Memorandum confirms that FDA4 was identified in the Residential GMS2022 Review as FUZ *'when Timaru requires further residential land this is a logical extension to the town'* however no timeframe was stated in this recommendation. Therefore, it is considered FDA4 is subject to assessment under NPS-HPL if rezoned through the PTDP process.
3. FDA1 amendment (as sought by client's submission 227.1): The Plans Memorandum, confirms that the extension to overlay FDA1 (part of notified FDA4 overlay) is considered to be Highly Productive Land and may be subject to assessment under NPS-HPL when rezoned.
4. FDA4 amendment (as sought by client's submission 227.1): The Plans Memorandum, confirms that the land subject to the change in boundary for FDA4 overlay is considered to be Highly Productive Land and may be subject to assessment under NPS-HPL when rezoned.

Therefore, only FDA4 and any proposed amendments sought by the submission (Points 2-4 above) are required to be considered against the requirements of NPS-HPL. As our client's submission seeks immediate rezoning of FDA1, and an extension to FDA1 is also sought, we have approached Agribusiness Group to obtain an assessment under Clause 3.6 (4) and (5) of the NPS-HPL to support the submission*. NPS-HPL Clause 3.6 requires:

- (4) *Territorial authorities that are not Tier 1 or 2 may allow urban rezoning of highly productive land only if:*
 - (a) *the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district; and*
 - (b) *there are no other reasonably practicable and feasible options for providing the required development capacity; and*
 - (c) *the environmental, social, cultural and economic benefits of rezoning outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*
- (5) *Territorial authorities must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.*

Notably, clause 4(c) requires that 'the environmental, social, cultural and economic benefits of rezoning outweigh the long term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.'

The 'National Policy Statement for Highly Productive Land - Guide to Implementation' (Ministry for the Environment, 2023), expands on the requirements of the assessment defined in clause 4(c). The guide also defines the meaning of intangible values as including:

- *Its value to future generations*

- *Its future characteristics and limited supply*
- *Its ability to support community resilience*
- *The limited ability of other land to produce certain products*

As noted in our submission, the proposed minor change to FDA1 is to allow for strategic and logical development of the area by including Taitarakihi Creek, along with its margins, within FDA1. This will enable better integration of the Creek into the development to appropriately address the esplanade, public access and Wai Taoka Lines, natural character and riparian margins, as well matters relating to stormwater management and the Flood Assessment Overlay. The change also better aligns with the northern boundary of FDA2 on the west side of Kellands Hill which will provide for a more coordinated approach to development and servicing within the subject catchments.

The area of the site within FDA4 was identified in the Planz Review of the Growth Management Strategy 2022 (GMS 2022) as suitable for future residential development. As our client seeks to amend the timeframe associated with FDA4 from “Beyond 10 years” to “less than 10 years”, no rezoning is currently being sought through the PTDP process. While NPS-HPL is a relevant planning consideration, it is not a requirement to be satisfied in order to enable the change to the FDA overlays as sought by our clients.

* Due to timing, we are unable to provide any supporting assessments in relation to NPS-HPL. We are happy to provide our third-party reports as received, if required.

Question 4: Rural Lifestyle Rezonings: *Demonstrate consideration and alignment with the requirements of the NPS-HPL **Clauses 3.7 and 3.10** for any submission that requests a Rural Lifestyle rezoning (**RLZ**) where the exemptions in Clause 3.5(7)(b) are not applicable.*

Not applicable.

Canterbury Regional Policy Statement

Question 5: Growth Rezonings / Amendments to SCHED-15: *Does the proposal, either individually or in combination with those areas identified in the PDP concentrate and promote a coordinated pattern of development (referencing capacity provided in **Section 8** of this report).*

As mentioned above, the site has already been identified as being suitable for development and is an acknowledged priority site for residential growth, hence its inclusion in the FDA overlay. The zoning is considered appropriate for the area given the proximity to established residential zoned areas, as well as FDA 2 and further west, FDA10. Council have already made significant progress in preparing a DAP and have provided a concept development plan to show an indicative development layout of the site as shown by **Figure 9** below.

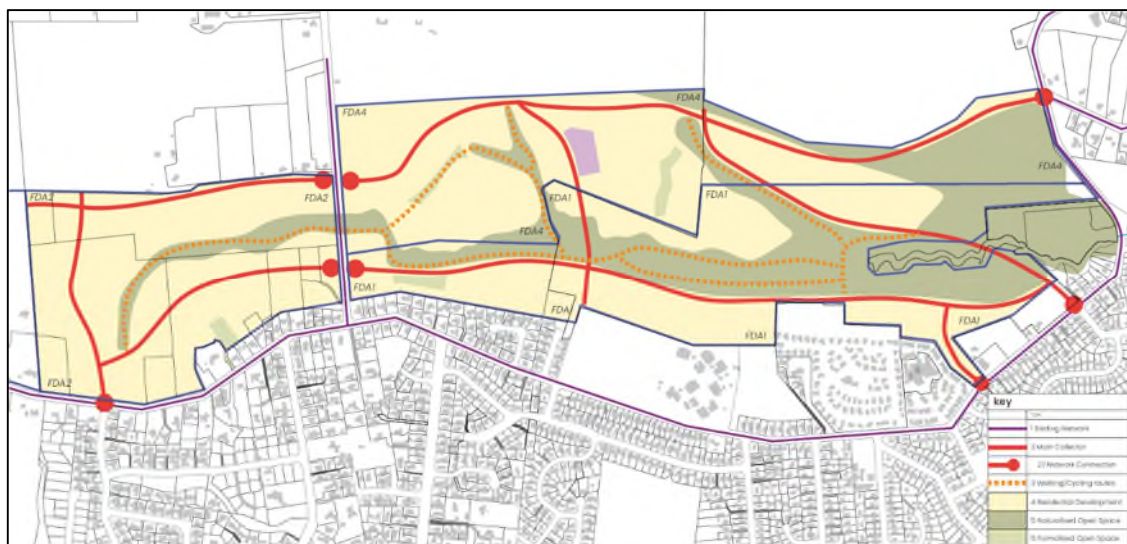


Figure 9: Council initiated Development Area Plan of FDA 1, FDA 2 and FDA 4

The subject site is located within an area of Timaru that is well serviced by roads and infrastructure, and has historically been popular with lifestyle development. In regards to FDA1 (in its entirety), the GMS 2022 review states that “At 12 HH/ha, the site could yield up to 444 HH over the life of the Plan.” We have reviewed this yield based on the DAP information received, as outlined above under Question 2.

Question 6: Energy efficiency: Does the proposal assist in maintaining an urban form that shortens trip distances.

The subject site has the potential to connect to local roading along Kellands Hill Road. Any residential development at the site will require a new road to be established to allow for vehicular access to all sites. This roading will be designed to efficiently move residents from the new development to the existing road network as required (including pedestrian and bike access). Council’s DAP includes a movement network that indicates how this may work, refer to **Figure 10** below.

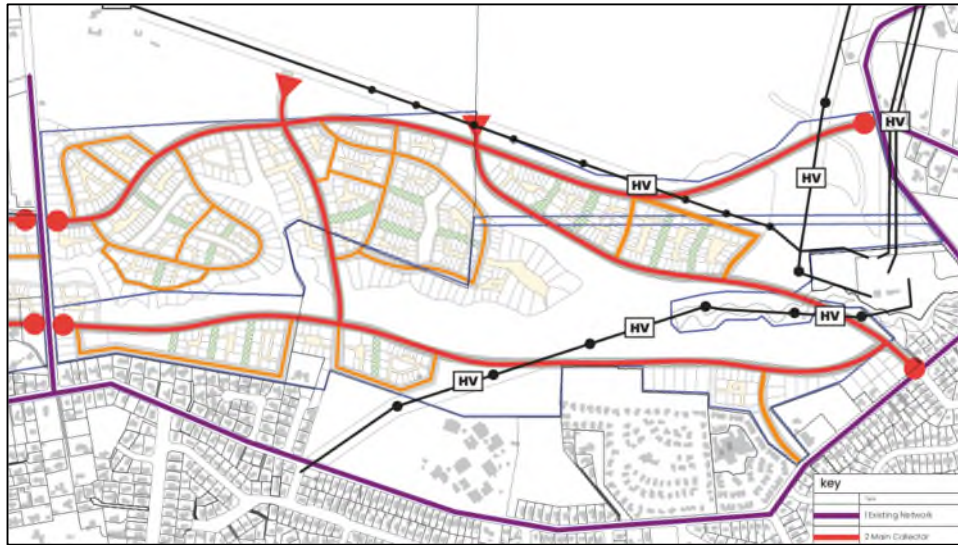


Figure 10: Timaru Draft ODP: Movement Network

As the subject site has road frontage to both Kellands Hill Road and Washdyke Flat Road there is an opportunity through the PTDP process to consider Council's wider roading network requirements including any desired road widening or safety upgrades.

Question 7: Natural Hazards: *Is the subject site associated with the submission free from inappropriate risk from a natural hazard event, if not what is the appropriate management response – including avoidance.*

FDA 1 and 4 are subject to a "Flood Assessment Area" overlay under the Proposed Timaru District Plan for Taitarakihi Creek. **Procerto's Infrastructure Report (Appendix 2)** references a report from WSP, being "Te Ahi Tarakihi Growth Assessment – Stormwater and Flood Risk" dated 15 March 2024 however we have not had the opportunity to review this WSP report. We note Procerto's Infrastructure Report does reference the need for dams to hold water within the Creek in FDA1. We note the DAP "GreenBlue Network" shows significant reserve areas along Taitarakihi Creek, which are anticipated to accommodate retention dams, as shown in **Figure 11** below.

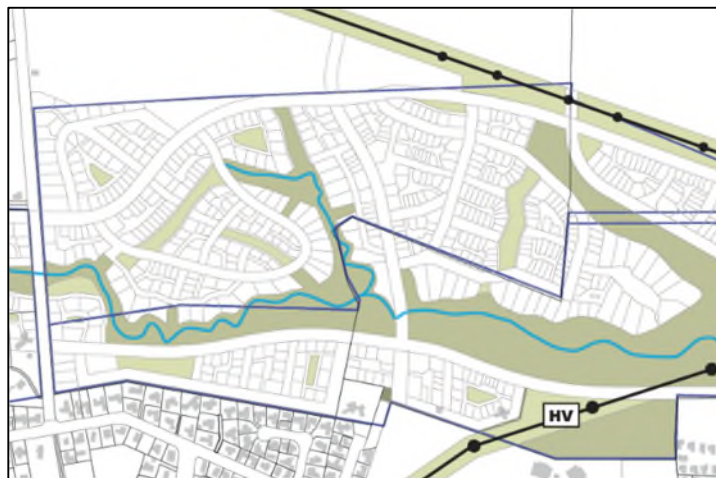


Figure 11: Timaru Draft ODP: GreenBlue Network

A geotechnical assessment was undertaken as part of Councils Development Area Plan which include the subject FDA 1 and FDA4 areas. This report concluded that *“The site can be developed through industry standard practices found in the Canterbury Region. Specific geotechnical assessment will be required as the development area is subdivided and developed.”*

Overall, the assessments above concludes that the site is not subject to inappropriate risk from natural hazards, and is suitable for residential development, subject to appropriate site testing and detailed design.

Proposed District Plan

Question 8: Proposed District Plan: *Does the urban growth / rural lifestyle development (and or sequencing) contribute to a consolidated and integrated settlement pattern, achieve a coordinated pattern of development and is capable of integrating with the efficient use of infrastructure?*

FDA1 is located on the immediate northern fringe of the existing Timaru township, with lifestyle development to the west of Kellands Hill Road and Mountainview High School located further to the east. Immediately south of the site is residential activity. The development of FDA1 will result in a consolidated and coordinated urban form, given the subject site’s location in relation to existing the urban area and established services. The site is unfragmented and held in one “ownership” which contributes to efficient development patterns.

Procerto’s Infrastructure Report (Appendix 2), covers matters of infrastructure servicing in more detail.

Question 9: Growth Rezonings / Amendments to SCHED-15: *Given the updated residential capacity projections in Attachment A, how does the proposal, either individually or in combination with those areas identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure ‘sufficient development capacity’?*

The subject site has already been identified as appropriate for residential development by strategic planning documents, and is identified by FDA areas 1 and 4. The change in FDA sequencing to “immediate” for FDA 1 and less than 10 years for FDA4 will not inhibit ‘sufficient development capacity’, but will instead allow the initial stages of development to commence in a timely manner and allow for future FDA areas to be “infrastructure ready”.

Given that FDA1 is required to bring infrastructure through to supplementary FDA areas further west, it stands that this would be the first FDA to be developed (if all FDA areas are developed in sequence in terms of priority), and any amendment to the FDA1 boundary will be not only negligible but essential to ensure appropriate servicing is established for other FDA areas. FDA 4 will allow for an ongoing and coordinated approach to development that is not out of keeping with existing urban development in the area, and connects to FDA1 to the south and the east.

For General Industrial Zone

Question 10: Growth Rezonings / Amendments to SCHED-15: *Given the Industrial land capacity projections, how does the proposal, either individually or in combination with those areas identified in the*

PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure 'sufficient development capacity'?

Not applicable

Infrastructure and integration with land use

In regards to Questions 11, 12 and 14, please refer to **Appendix 2** for the **Draft Infrastructure Report** prepared by Procerto Group Ltd for Council, dated 26 April 2024. This report outlines potential servicing options for FDA 1, 2, and 4, demonstrating how these areas can be serviced from the Council network.

For further details on the required infrastructure upgrades under high growth scenarios, please refer to **Appendix 5** for the **WSP Water and Wastewater Growth Capacity Assessment Report**.

Question 11: Service Provision: *Identify (in conjunction with the requirements of **Attachment B**) how the future servicing needs of the area and the provision of adequate, coordinated and integrated infrastructure to serve those needs, including how using water sensitive design to manage stormwater will be undertaken.*

The **draft Infrastructure Report** prepared by Procerto Group Ltd (**Appendix 2**) demonstrates how FDA 1, 2 and 4 can be serviced from the Council networks.

The draft report highlights servicing within the FDA areas as well as the impact of the proposed growth on the existing network, taking into account the WSP reports which recommends necessary upgrades to Council's reticulation system to support the proposed **FDAs**. The specific required upgrades have been identified in the WSP Growth Capacity Assessment for Water and Wastewater Report. To facilitate these improvements, the upgrades must be incorporated into the Council's Long-Term Plan (LTP) to trigger the necessary upgrades.

Financial Contributions or a similar funding mechanism will need to be established to enable the growth of the proposed FDAs and Council to recover proportionate costs.

Question 12: Infrastructure integration: *Identify whether the rezoning if not required for 'sufficient development capacity' would result in wider issues for the district in terms of integration with infrastructure planning and funding decisions, or where for Rural Lifestyle Rezoning has consequences for overall yield / density and servicing requirements.*

The subject site has already been identified as appropriate for residential development and is identified by FDA areas 1 and 4. The change in FDA sequencing to "immediate" for FDA 1 and less than 10 years for FDA4 will not inhibit 'sufficient development capacity', but will instead allow the initial stages of development to commence in a coordinated manner. It is important to consider that infrastructure needs to traverse the subject site to enable further development of upstream FDA catchment areas, therefore this site plays a vital role in achieving overall infrastructure integration. This not only benefits new greenfields development areas but can provide resilience and supply to the existing urban environment.

Amending the proposed FDA1 & 4 boundary not only makes sense to better align with site topography, but is critical to ensure that integrated infrastructure can traverse through the site with enough new development yield to make it feasible to do so, subsequently unlocking development opportunity for upstream catchment FDA areas (i.e. capturing all land needed for stormwater reserves and trunk infrastructure within the greenspace reserves). Said another way; the meaningful development of FDA2 is largely contingent on FDA1 being completed.

Transport

Question 14: Transport network integration: *Demonstrate with reference to suitable standards and the potential yield / density of development – the safe and efficient functioning of the supporting transport network, ability to facilitate modal choice, and consolidating an accessible urban form.*

As part of preparing the Development Area Plan (DAP), **Abley** have completed a draft Integrated Transport Assessment (ITA) for FDA 1, 2 and 4. The draft DAP (**Appendix 3**) shows road and public space connectivity, providing for a variety of modal choice. Of note, the draft Abley ITA states in the Executive Summary that:

In terms of the proposed transport network for the Site, we consider that:

-The proposed connections to the existing transport can operate safely, subject to further design and assessment as part of future resource consent applications.

-The internal transport network can provide for walking and cycling modes, and is future proofed for fixed public transport routes.

This will be subject to further design and assessment as part of future resource consent applications.

Question 13: Hazards: *Demonstrate with reference to suitable standards, the avoidance and / or management of inappropriate natural hazard risk, and suitable geotechnical conditions.*

As mentioned in Question 7 above, the site is subject to the flood assessment area overlay (which in the case of FDA1 and 4 typically are located along gully inverts). This flooding risk is anticipated to be managed through the proposed natural hazards provisions in the PDP, and can be dealt with at the time of subdivision consent is sought.

Procerto's Infrastructure Report (**Appendix 2**) identifies that stormwater control/management will be required to minimise flood risk hazards on downstream properties, including flooding of roading in extreme events. Mitigation is currently proposed by the use of stormwater retention dams located within FDA1.

Any stormwater design, stormwater discharge and management of flood flows will be subject to consent approval from ECAN and/or Timaru District Council.

Environmental values

Question 15: Existing Environment and characteristics: *Identify the following as relevant to the submission:*

- (a) The existing lawfully established land use(s) as they relate to the area that is subject to the submission, including: density (and existing fragmentation of sites), amenity and character, and range of uses.*
- (b) Geophysical boundaries that would distinguish zone boundaries, including how the proposal would result in the contiguity of existing urban areas (proximity and agglomeration of existing urban areas).*
- (c) Existing resource consents that provide for established land uses, including alignment with the anticipated outcomes associated with the submission.*

The site is predominantly in pasture and run as a sheep farm in one holding. The woolshed, sheeppens, farm yard and dwelling are all located adjacent to Kellands Hill Road. The site is intersected by multiple waterways (Washdyke Creek and Oakwood Stream to the North and Taitarakihi Creek to the south). As outlined in the original submission the FDA boundaries sought were aimed at aligning to natural features present on the site; e.g. fences, hedges, property boundaries, while considering the natural gullies (future stormwater/reserve areas) and how best to develop the site with this in mind.

Question 16: Environmental Values: *Where the site incorporates or adjoins any of the following as notated within the PDP:*

- (a) Specific values associated with Landscape values and natural character.*
- (b) Biodiversity constraints.*
- (c) Cultural and / or Heritage values.*
- (d) Existing or permitted Intensive Farming Activities, Rural Industry or other established Rural that could generate incompatible land uses with the submission outcome.*

The site is not located within an area of natural significance, biodiversity overlay, or is identified for cultural or heritage values (outside of noted overlays). These matters do not constrain the site nor are there any incompatible use matters that would arise as a result of altering the sequencing and timing of the FDA requirement.

Submitters shall provide information as to whether any additional standards, rules or methods (other than those already contained within the respective zone standards) are required to maintain or enhance any specific attribute, value or effects. This shall include where specific features or attributes should be retained through subsequent subdivision, use or development.

No specific additional standards, rules, or methods have been considered as part of this additional report memo, however, it is acknowledged that it may be appropriate to generate site specific rules and methods such as the provision of Council's outline development plan to ensure that future development proceeds in a prescribed manner, providing certainty for both Council and the community.

Specific matters

Question 17: *Submitters shall provide information and analysis on the specific matters identified, noting that*

these may well overlap with Questions 1 – 16 above.

All of the relevant specific matters and information requirements have been included in earlier sections of this report memo.

4 CONCLUSION

The submitter supports the Proposed Timaru District Plan (PTDP) and the designation of their site for future residential development. However, they request an expedited rezoning process to allow for immediate development, citing completed concept plans and technical investigations. This memo highlights the need for adjustments to Future Development Areas (FDA) 1 and 4 to better align with site characteristics, infrastructure planning, and natural features.

Key planning frameworks, including the National Policy Statement on Urban Development (NPS-UD) and the National Policy Statement on Highly Productive Land (NPS-HPL) have been considered. It is concluded that rezoning FDA1 and FDA4 will contribute to; a well-functioning urban environment, enhance housing diversity, and integrate with infrastructure planning while ensuring sustainable growth. Concerns over yield assumptions in the Property Economics analysis are raised, suggesting a more localised approach is needed to accurately project development capacity.

Infrastructure and environmental considerations, including stormwater management, transport connectivity, and hazard mitigation, have been addressed through technical assessments. The submitter argues that delaying development could increase costs and reduce housing options, and therefore, immediate rezoning without FDA constraints is recommended to facilitate efficient and cost-effective urban expansion.

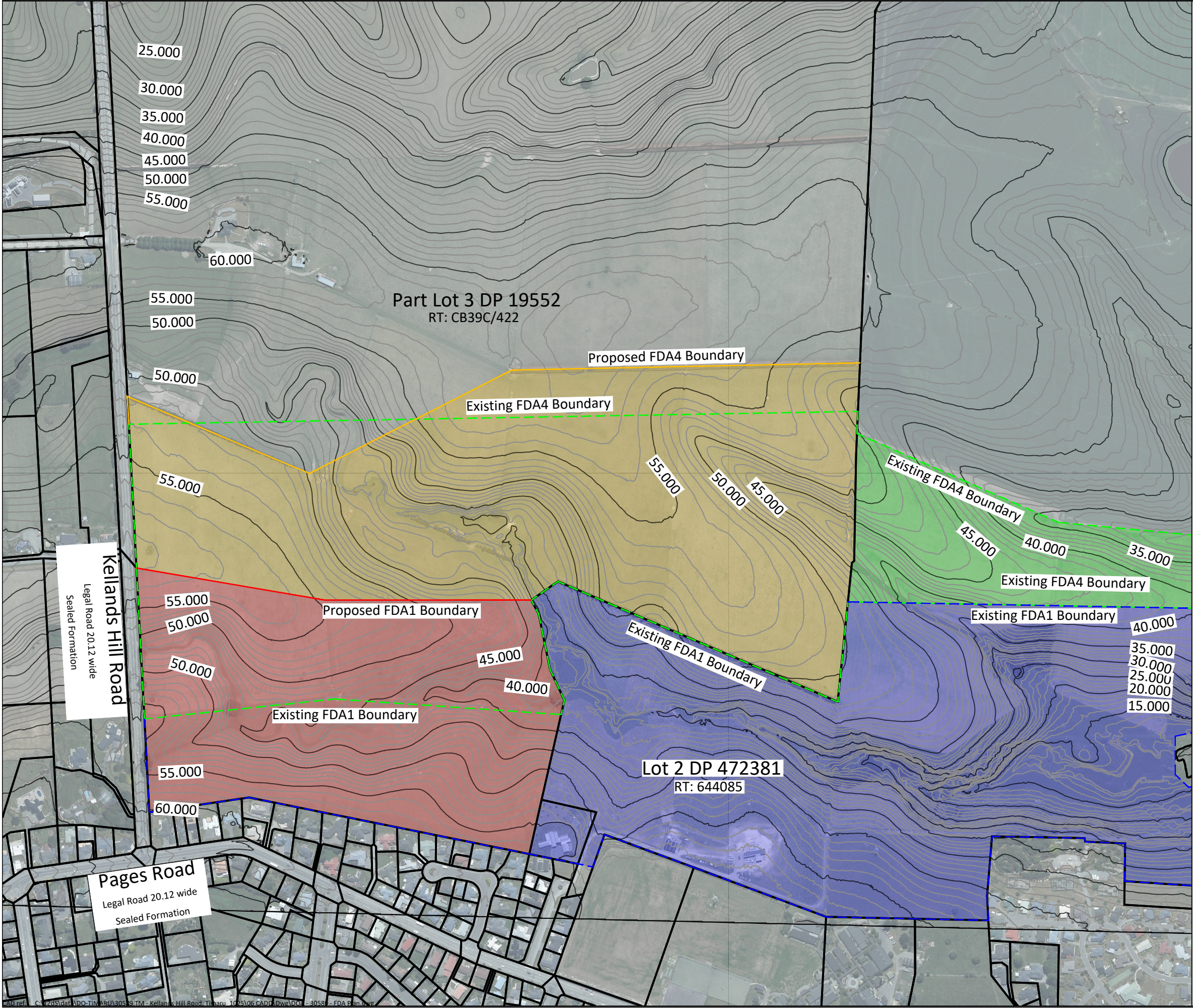
Disclaimer: The above is intended to provide the preliminary s.42A author with some further information in regards to the suitability of the site for development. The submitter retains their right to provide further information in response to the s42A report and is not bound by the information provided to date.


5 ATTACHMENTS

- Appendix 1 – Table 1 Checklist for Submitters
- Appendix 2 – Procerto Infrastructure Report
- Appendix 3 – Timaru District Council Draft ODP
- Appendix 4 – Novo Group Memo on NPS-UD
- Appendix 5 – WSP Water and Wastewater Growth Capacity Assessment Report

APPENDIX B

Contour Plan and FDA Overlay





NORTH

Issue	Date	Reason	Approved
A	11/24	For Discussion	GPM
B	06/25	Plan Revised	GPM

Client: Rosa Westgarth and Jan Gibson

Address: 82 Kellands Hill Road, Washdyke Flat, Timaru

Appellation: Part Lot 3 DP 19552

RT Reference: CB39C/422

Total Area: 187.3329ha

Survey Datum: NZGD2000, Timaru Circuit

Horizontal: New Zealand Vertical Datum 2016

Vertical:

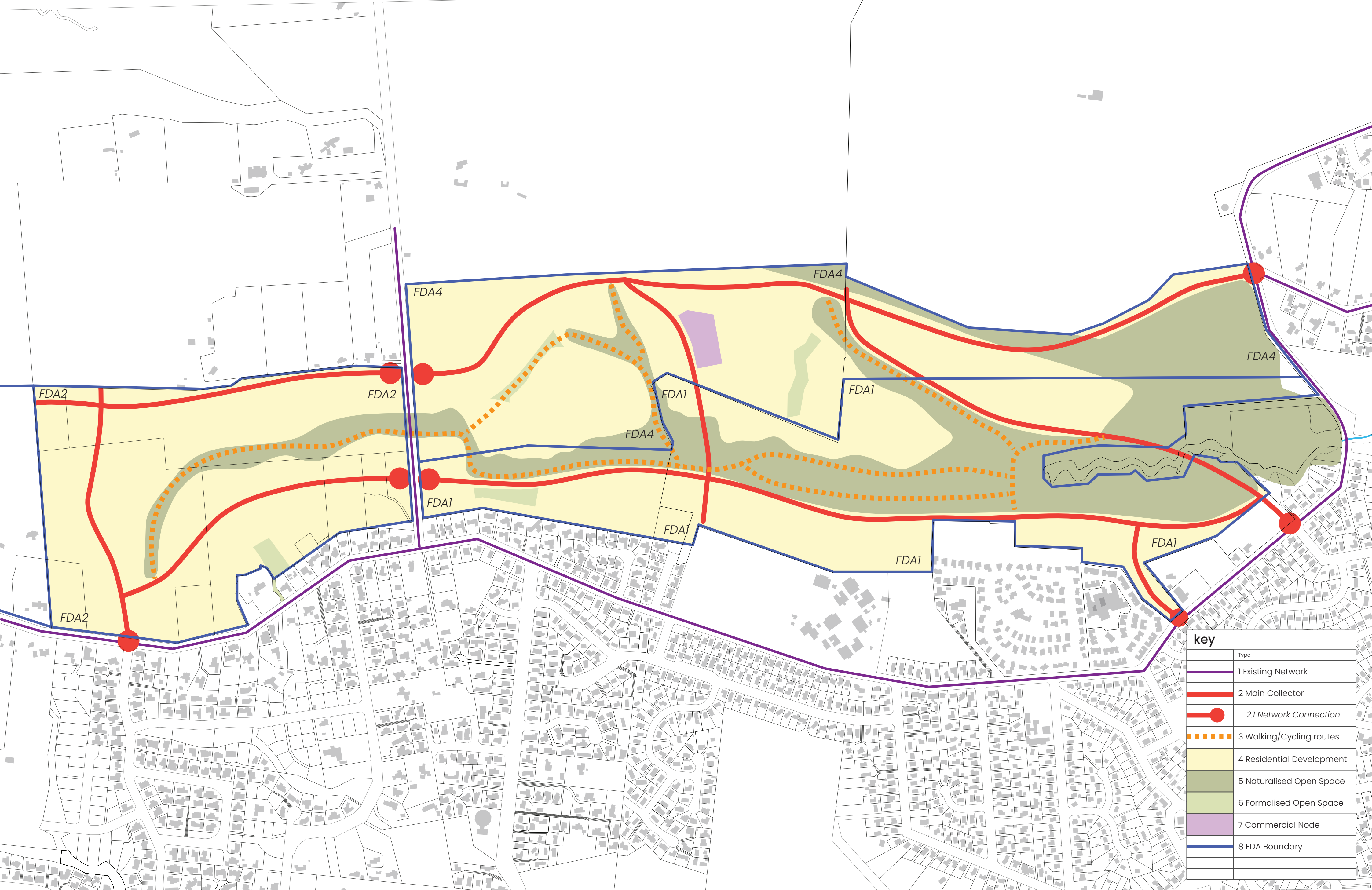
- Notes:
- All dimensions in metres unless shown otherwise;
 - Existing boundaries calculated from LINZ
 - Boundary dimensions and areas are subject to title survey
 - Aerial Photography: Sourced from LINZ Database under Creative Commons Attribution 4.0 International
 - For dimensions, areas, easement, covenants and consent notice information, refer to CB39C/422 and Part Lot 3 DP 19552
 - Major contours shown at 5m intervals
 - Minor contours shown at 1m intervals
 - Existing services shown are based off TDC's GIS recorders and should be treated as indicative only
 - Existing services are located within the proposed works area, including services not necessarily shown on this plan. It is the Contractors responsibility to locate and protect all existing services including liaison with the relevant Service Authority, Council or Land Owner

Key:

- Existing FDA1 Boundary
- Existing FDA4 Boundary
- Proposed FDA1 Boundary
- Proposed FDA4 Boundary
- Existing FDA1 Area
- Existing FDA4 Area
- Proposed FDA1 Area
- Proposed FDA4 Area

APPENDIX C

Timaru District Council - ODP



key	
	Type
	1 Existing Network
	2 Main Collector
	2.1 Network Connection
	3 Walking/Cycling routes
	4 Residential Development
	5 Naturalised Open Space
	6 Formalised Open Space
	7 Commercial Node
	8 FDA Boundary



0

200

400m

rev	date	details	by
a	21.01.2025	issue to consultants	cc
b	30.01.2025	issue	cc
c	03.02.2025	issue	cc
d	05.02.2025	draft issue	cc

scale 1:5000	size A2
Do not scale drawings. Verify all dimensions on site	
drawn CC	date 05.02.2025

project	FDA 1/2/4	
name	outline development plan	
drawing	project 2323	rev a