

**BEFORE THE HEARING COMMISSIONERS
IN TIMARU DISTRICT**

IN THE MATTER of the Resource Management Act 1991 ("the Act")

AND

IN THE MATTER of the Proposed Timaru District Plan
Hearing G – Growth and Designations

Statement from Bruce Roberton

For Bruce and Sharon Roberston (Re-Submitter 273)

Members of Joint Submitter Group (Submitter 108)

04 July 2025

Due to other commitments, I am unable to present in person.

I request my Statement be tabled for the Commissioners' consideration.

1. Overview of Submission

We oppose the Section 42A recommendation for a minimum lot size of 2 hectares (ha) in the area between Main North Road, Bennett Road, and Templer Street. Our property at 30480 m² (3.048 ha) would effectively be 'locked out' from any subdivision or reconfiguration under the proposed zoning, which is inconsistent with the existing pattern of land use in the area.

We support a lesser minimum lot size rule to achieve a more flexible rural lifestyle zoning approach that reflects the existing character of the area and enables optimal, sensible use of the land.

2. Existing Development Pattern and Zoning Precedent

The proposed 2ha minimum lot size does not align with the current subdivision pattern in the Main North Road, Templer Street, Bennett Road area.

- The total area is only 56.134 ha
- There are 38 separate titles.
- The average lot size across the area is approximately 1.4 ha.
- Only 7 lots exceed 2 ha; the remaining 31 lots average just over 7000 m² with the smallest being 0.809ha (our most immediate neighbour).
- A number of subdivisions were approved during the life of the previous plan that were under 2 ha which sets a precedent here.

Council allowed these subdivisions under its "enablement approach" with the previous District Plan's provisions. To now apply a more restrictive lot size in this particular area—without transitional provision or acknowledgement of established form—risks creating inequitable outcomes.

Those who pursued subdivision consent under the previous Plan could be considered "winners", those of us who did not would be the "losers".

We were certainly not aware that this was the approach that Timaru District Council were taking during that period and the only recourse open to us has been advocating through the District Plan Review process.

3. Site Suitability and Land Use

Our property is small, it is also stony (LUC 1), and not agriculturally productive just like all the other lifestyle properties around us. We use it for traditional rural activities like grazing a small number of cows, which effectively mows the grass. It is certainly not used to generate any particular income that we rely on.

The area is though, well suited for rural-residential use. It is flat, flood/hazard safe and within easy walking and cycling distance to the Geraldine town centre (2 km). The area offers prime rezoning potential and is a logical direction for northward growth of the town.

This area has been recognised in earlier TDC planning documents including the Growth Management Strategy, Draft Timaru District Plan, summary report by Planz Consultants, and in the FDA 11 notification within the Proposed District Plan, which deferred rezoning as RLZ for beyond 10 years.

It is also clearly viewed by Environment Canterbury (ECAN) as being part of the urban area as it is included within the Geraldine Clean Air Zone (Figure 1 and 2 below).

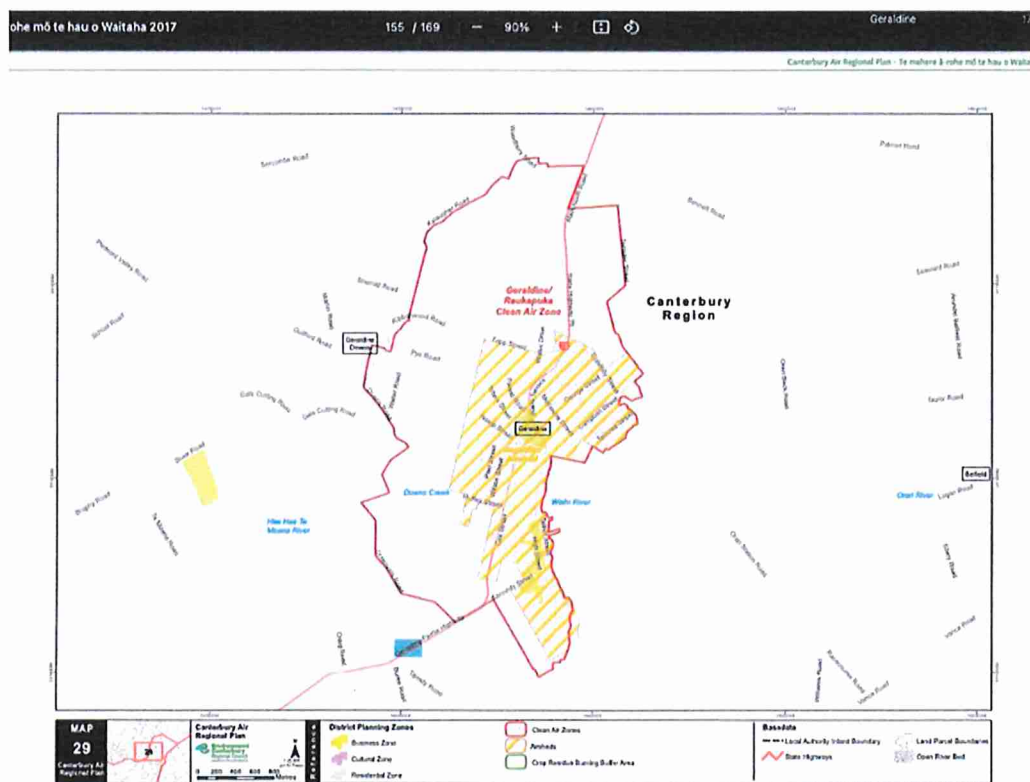


Figure 1: Geraldine / Raukapuka Urban Clean Air Zone (Map 29, Canterbury Air Regional Plan)

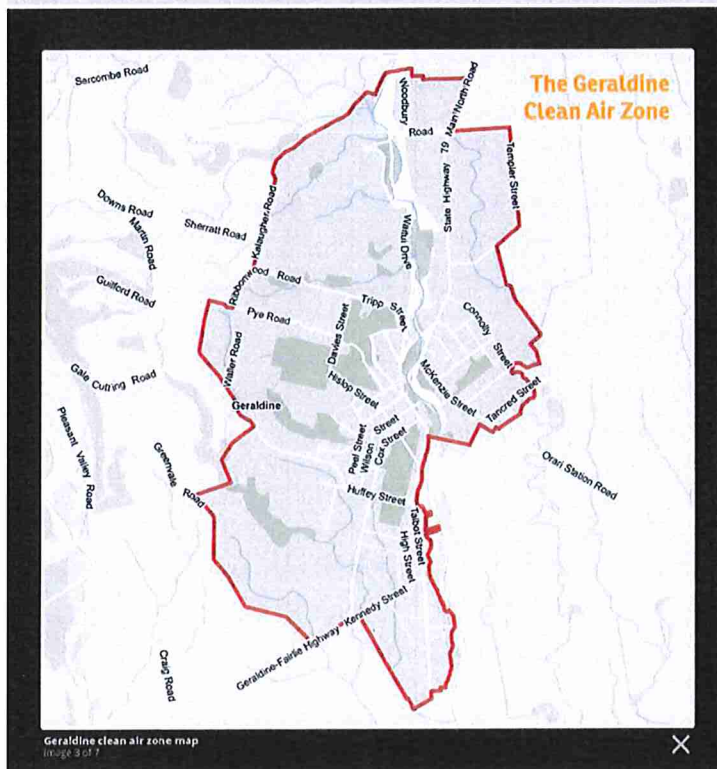


Figure 2: Geraldine clean air zone map, illustrating northern boundary in Templer Street and Bennett Road along our property's eastern and northern boundary (Canterbury Air Regional Plan).

The Section 42a report writer has accepted that the FDA notification which would require a Development Area Plan (DAP) is unachievable due to the already fragmented nature of the area.

To impose a minimum lot size of 2 ha ignores the level of subdivision that has occurred in the area and limits development that could help meet demand for rural lifestyle lots in a balanced, low-impact way. This is achievable on much smaller lot sizes than 2ha.

The Report Writer states the following:

"An immediate rezoning would enable those six allotments promptly"

I view this comment as being purely speculative. It shows no comprehension of the costs that would be incurred to develop "those six allotments" with consenting, development costs etc. It shows no understanding of the economics and that yield from any development is an important consideration.

My own entirely speculative view is that due to these economics at a lot size of 2ha these lots would be unlikely to happen. High consenting, development and contributions on the base of a minimum yield would act as a major disincentive to any further subdivision. This is not a proactive, well considered planning approach and if these developments did in fact proceed, it would lead to an outcome that is wasteful of the limited Rural Lifestyle land resource.

A lot size of 2 ha also ignores what the market (buyers) are looking for in Geraldine. Local real estate agents state that buyers are looking for more manageably sized lots with amenity values that are not offered by smaller township-sized sections. A 2 ha lot is a significant area of land to manage, and while lifestyle block owners are looking for rural amenity (hence the appeal of Geraldine) they generally also have full time employment elsewhere.

This is the case for my wife and me. We have lived in Geraldine for 35 ears. It offers us high amenity compared to other South Canterbury towns and was a great place to raise our (now adult) children. However, I own a business operating at Timaru Airport and my wife works in the insurance industry and we both commute to Timaru on a daily basis.

4. Servicing and Infrastructure

Water: Our property, like all the others in the area, is serviced by the Te Moana water supply scheme. The recent \$3.4 million upgrade was explicitly to meet the 2022 Drinking Water Standards—not for stock water or irrigation – but also increased the capacity of this scheme. TDC’s website advises that 560 units (and half units) are currently available for purchase for rural and domestic use. This suggests there is more than sufficient capacity to supply significantly more lots than the 6 recommended for our area by the Section 42a Report Writer.

Wastewater: Timaru District Council has stated *“There is no funding in the LTP to provide or contribute towards reticulated wastewater infrastructure in this area”*.

Much has been written by various report writers about the pathway for further on-site wastewater systems in this area under the CRPS.

It goes without saying that, if such a pathway exists, any on-site system will be required to meet exacting environmental outcomes to be consented by ECAN.

The same cannot be said for the substantial number of aged, legacy septic “soak-holes” discharging waste along the western side of Main North Road.

The lack of intent to provide a long-term solution for these residents is a serious matter and requires an urgent solution from the Timaru District Council. No improvement in the water quality of the adjacent Waihi River can be expected while this situation is allowed to continue.

Reticulated wastewater systems are cost-neutral for Council over time anyway, as users pay for them and this would mean there was no impediment to housing intensification to the north of Geraldine. More houses mean more ratepayers contributing to Council’s finances as well by providing a higher tax base.

The institutional memory may have been lost at TDC, but it would be worth considering the model that was used when the reticulated wastewater system was installed for parts of the

Geraldine Downs area. While it wasn't compulsory to connect to it, those who didn't were still required to contribute to servicing the Council's debt for the system.

The Council's decision not to enable reticulated wastewater in this area should not be used to frustrate the decision to rezone the area to reflect its existing land use. On-site wastewater management is a matter for the consenting bodies.

5. Strategic Growth and Planning Consistency

Timaru District Council has acknowledged that its approach to zoning has had “unintended consequences” and these can be seen in this area. The current proposal does not correct these consequences - it exacerbates them.

Nearby towns such as Ashburton and Methven have obviously taken a much more enabling approach to land availability for development, and it is visible with new housing being built.

Methven has grown by 11.1% between the 2018 and 2023 censuses reflecting a clearly stated intention to become more than a winter-only destination with development of the Opuke Hot Pools and Spa and several new residential and high amenity rural lifestyle / rural residential developments going ahead. These have included Karkariki View, a 20 x lot development with an average lot size of 4000 sq m and also the Mt Harding Road development with similar lot sizes. My understanding is that these developments are not connected to the Methven reticulated wastewater system.

My main point however is that these residents bring prosperity to the town and Geraldine has been missing the opportunity to attract these residents due to the lack of housing and land available.

Timaru's growth and economic indicators have been poor relative to its regional neighbours (Table 1 below). The Timaru District is the only district that didn't meet or exceed the modest national figures in 2024.

Table 1: Comparative population and GDP Growth Data for 2024.¹

District	Population Growth	GDP Growth
Timaru	0.8%	-0.6%
Ashburton	1.9%	1.8%
Waimate	2.8%	2.9%
Mackenzie	3.7%	3.0%

Geraldine offers high amenity and growth potential but is constrained by inflexible planning provisions that are not reflecting existing land use patterns or demand.

¹ Infometrics, 2024.

We request that the Commissioners:

- Reject the blanket 2 ha minimum lot size in this area;
- Enable a more nuanced rural lifestyle zone with flexible lot sizes that reflect existing development patterns and are able to be developed to be sensitive to the environment. This would achieve the requirements of the PTDP Subdivision Chapter, as follows:

SUB-01 General Subdivision Design

New subdivisions will:

- 1. Accord with the purpose, character and qualities of the zone; and*
- 2. Respond positively to the physical characteristics of the site and its context; and*
- 3. Maintain and enhances amenity values and the quality of the environment*
- 4. Be accessible, connected and integrated with surrounding neighbourhoods*

SUB-P6 Infrastructure

...

- 3. Allotments to connect to the Council's reticulated systems where available*

...

- Acknowledge the established subdivisions already approved and consented under the previous District Plan;
- Provide for sustainable and consistent use of land that avoids perverse planning outcomes and waste of the limited lifestyle land available.

Such changes would restore equity to landowners in the area that have land areas that are larger than 2 ha and support more efficient, appropriate growth in Geraldine.

Sincerely



Bruce and Sharon Robertson
4 July 2025