



Bruce Speirs BSurv
Cadastral Surveyor

37 Sophia Street, Timaru
Post Box 611, Timaru 7940
E-mail: lsgl@xtra.co.nz
Ph: (03) 684 6645
or: (03) 308 3083

11 July 2017

Kylie Galbraith
Senior Planner
Timaru District Council
Post Box 522
Timaru
7940

Dear Kylie

SUBMISSION
TIMARU DISTRICT 2045 DRAFT GROWTH MANAGEMENT STRATEGY

This submission falls outside the 12 May 2017 timeframe indicated in your letter of 26 April 2017, unfortunately coronary bypass surgery has delayed my ability to respond before today.

As per my letter of 13 February 2017 regarding the plan review discussion documents, it is unfortunate the draft growth strategy was not made available sooner, as its delay in release has limited meaningful comment on the plan review discussion documents.

There appear to be a number of questionable assumptions made throughout the draft growth strategy document. For example, in terms of residential intensification, a simple rezoning for higher density does not mean this intensification will occur within any specified timeframe, as intensification generally only occurs when existing buildings on land have minimal capital value, and this is highly variable.

Another example where zoning does not guarantee the envisaged use would be the NW of Temuka, where land has relatively recently been rezoned Residential, but the land has then been effectively used for rural residential use. It is unlikely this area will be used for residential development within the next 20 - 30 years, and then only with an abandonment of the current district plan rules for this area.

A longer standing example of land use at odds with its zoning can be found in the Oceanview area of Timaru, between Jellicoe Street/ Old North Road/ Tasman Street and State Highway 1. This area has been zoned Residential for many years, but is still utilised for rural residential purposes, and, notwithstanding council's recent structure plan for this area, it is still unlikely to be converted to residential use in the foreseeable future (its all about economics, lifestyle and timing).

While the growth strategy indicates there is sufficient land zoned for residential use, the above examples should highlight this is unlikely to be the case

It is my view that the introduction of a rural residential zone is a bad idea, which will require the extension of urban style infrastructure (eg. sewage and stormwater) into these zones. This view appears to be supported on page 38 of the report, Rural, fourth -, "The potential of intensive rural residential development to create public health or environmental problems through on-site disposal of wastes and to adversely affect ecological sensitive areas."

Figures provided in the growth strategy show that most people in the Timaru district do not wish to live at higher residential densities, and the market for higher residential densities is therefore limited. Further, those dwellings built at higher residential density are not necessarily smaller than those built at lower densities, which means an increase in the percentage of impervious areas in the more intensive residential zones, placing additional strain on existing sewage and stormwater infrastructure, which then require replacement or upgrading over extended areas of their catchments.

With limited supply comes limited competition and higher price. The only way the District Plan can have any influence on the price of residential land is to have a large surplus of land zoned for residential use. This principle will also apply to rural residential land use, and the proposal to restrict the development of rural residential development to designated zones is likely to lead to an increase in the price of such land.

I must take exception to the Peripheral Expansion comments on page 24 of the Strategy. Greenfield development on the edges of existing settlements is already leading to a greater mix of allotment sizes, leading to higher densities in these areas. However the churn of house sales in the newer higher density areas of Glen-iti show that this trend can quickly exceed the public's actual desire to live at higher residential densities.

Further, it is the development in areas higher up catchments (such as Glen-iti) which cause the most difficulty for sewage and stormwater infrastructure, and places the most pressure for the replacement or renewal of that infrastructure lower in the catchment. The alternative to this type of development is to **encourage** greenfields development on the lower portions of catchments on the periphery of existing settlement areas, where connections for infrastructure do not require the replacement or upgrading of existing infrastructure, and the costs of the new infrastructure can be placed wholly on the land developer.

Page 82 of the document, F:7.1, includes the comment "the retention and protection of large landholdings is required where possible". The effect of such a policy is to drive a corporatisation of farming, at the expense of family farms. This has the follow on effect of making rural workers employees, who in general have reduced ties within the rural community where they work (as opposed to owning families living in those communities), making it more difficult to sustain those communities.

The current "dispersed" rural living gives better community and social results, makes better use of infrastructure such as roading, power and telecom services, and provides more rural users with better services than can economically be provided with lower residential densities.

It is my view that Council needs to be more aware of the potential for a District Plan to "encourage" social change within communities as an unintended consequence of its content.

In terms of Industrial land, the Port has had a recent increase in container traffic which has lead to a significant expansion of container handling facilities close to the port, reducing the availability of industrial land on the ocean side of the coastal cliffs to other industrial users, and any expansion of industrial development is likely to have to occur at Washdyke, or, by greenfields development further afield.

I note the inclusion of reference to the Highfield commercial area in the strategy document, but also the lack of any recognition of the Ashbury commercial area within the document. In terms of the commercial areas of Timaru in general, the strategy appears to ignore the fact that alternative commercial areas have historically grown because the Timaru CBD area does not have land availability or space for large format retail activity (particularly supermarket or Warehouse/ Smith City/ Harvey Norman type development) at a reasonable cost.

It is perhaps fortunate that recent earthquake legislation will force the redevelopment of large portions of the Timaru CBD, as this is unlikely to occur otherwise.

Yours faithfully

BW Speirs

B W Speirs
Cadastral Surveyor