

**BEFORE THE HEARINGS PANEL
FOR THE PROPOSED TIMARU DISTRICT PLAN**

UNDER the Resource Management Act 1991 (RMA)

IN THE MATTER of the Proposed Timaru District Plan

AND

IN THE MATTER of Strategic Directions and Urban Form and Development Chapters (Hearing A)

**STATEMENT OF EVIDENCE OF DEIDRE FRANCIS ON BEHALF OF THE
CANTERBURY REGIONAL COUNCIL**

Strategic Directions and Urban Form and Development Chapters

22 April 2024

Next date: 7- 8 May 2024 – Hearing

TABLE OF CONTENTS

SUMMARY STATEMENT	1
INTRODUCTION	1
SCOPE OF EVIDENCE	3
STATUTORY TESTS	4
REGIONAL COUNCIL'S INTEREST & OVERVIEW OF SUBMISSIONS	5
STRATEGIC DIRECTION	5
Objectives	
Matters accepted in the s42A report	
URBAN FORM AND DEVELOPMENT	8
Matters accepted in the s42A report	
Changes sought by the Regional Council	
Rationalisation of Plan Provisions Placement	
Minimum yield of 12 HH per ha	
ATTACHMENT 1: Statutory Framework	
ATTACHMENT 2: Recommended Amendments to pTDP	
ATTACHMENT 3: Snips from Canterbury Maps Showing LUC 2 & 3 soils around Timaru District Towns	
ATTACHMENT 4: Amendments sought through the original Regional Council submission	

SUMMARY STATEMENT

- 1 The Canterbury Regional Council (**Regional Council**) submission is generally supportive of the proposed Timaru District Plan (**pTDP**). I have reviewed the report prepared under section 42A Resource Management Act (**RMA**) by Mr Andrew Willis (Strategic Directions and Urban Form and Development Chapters) for the Timaru District Council.
- 2 I support the recommendations made by Mr Willis with regard to objectives SD-O1, SD-O2, SD-O3, SD-O4, SD-O8, and UFD-O1, as they align with the CRPS.
- 3 I believe there is still a need to amend the Future Development Areas (**FDA**) chapter to ensure strategic consideration of future development occurs. In particular to prevent unanticipated and out of sequence development in rural lifestyle zones. The Regional Council therefore requests amendment to the FDA chapter introduction as well as a new Objective to address unanticipated and out of sequence rural lifestyle development.
- 4 In addition, I consider that a 12 household per hectare (12HH) minimum yield policy is appropriate in the General Residential Zone (**GRZ**) FDAs to achieve well-functioning urban environments, housing affordability and efficiency, supporting a range of housing typologies, creating certainty and reducing future pressure on Highly Productive Land (**HPL**). This will better achieve the objectives of the pTDP and better give effect to the Canterbury Regional Policy Statement 2013 (**CRPS**), National Policy Statement - Urban Development 2020 (**NPS-UD**) (clause 2.1 Objectives 1, 2, 3, 6 and 8, and clause 2.2 Policies 1, 2 and 6) and National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**) (clause 3.6(4) and (5)) which restrict urban rezoning of HPL.

INTRODUCTION

- 5 My full name is Deidre Francis.
- 6 I am a Principal Planner at the Regional Council, a position I have held since August 2022.
- 7 I hold a master's degree with distinction in Regional and Resource Planning from the University of Otago (1995) (**MRRP**). I have over 20 years' experience in resource management planning.

- 8 My relevant experience includes drafting plan provisions, preparing s32A reports, preparing s42A reports and decisions reports for Council Plan hearings, preparing submissions and presenting at hearings on proposed district plans. I led the development of the first Southland Regional Coastal Plan and the first Southland Regional Water Plan.
- 9 Prior to joining the Regional Council, I worked as Senior Management Planner for the Department of Conservation based in the Christchurch office, working on the Rangitahi/Molesworth Recreation Reserve Management Plan and leading the Aoraki Mount Cook National Park Management Plan. Prior to that I worked for 14 years at the Southland Regional Council, starting as a graduate planner and finishing as Senior Planner. I also worked for the Planning Consultancy Ernest New and Associates in Invercargill, part time, while completing my MRRP.
- 10 While I acknowledge that this is not an Environment Court hearing, I confirm that I have read and am familiar with the **Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023**. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving any oral evidence during this hearing.
- 11 The original submission from the Regional Council was prepared by a number of people. Where I was not the author of any particular submission I have consulted with the original author before forming an opinion/response to the s42A report comments. Except where I state that I am relying on the evidence of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 12 Although I am employed by the Regional Council, I am conscious that in giving evidence in an expert capacity that my overriding duty is to assist the Hearing Panel as an independent planning expert. The recommendations made in this evidence are my own, based on my expertise.

In preparing my evidence I have reviewed the following documents:

- a. NPS-UD;
- b. NPS-HPL;
- c. CRPS;

- d. Timaru District Council Growth Management Strategy Review: Residential – Planz Consultants 2022 (**TDC Growth Strategy Review**);¹
- e. Timaru District Council Recommendation report on chapter options regarding growth – Planz Consultants 2021;²
- f. the notified provisions of the Strategic Directions, and the Urban Form and Development chapters of the pTDP including the section 32 RMA analysis and supporting information notified by the Council;
- g. the Regional Council submissions on the Strategic Directions and Urban Form and Development Chapters of the pTDP.
- h. the summary of submissions made on the notified provisions within the Strategic Directions, Urban Form and Development and Future Development Area chapters of the pTDP, to the extent they are relevant to the Regional Council's interests (and where relevant, the submissions themselves) as well as the summary of further submissions, to the extent they are relevant to the Regional Council's submissions (and where relevant the further submissions themselves); and
- i. the section 42A report by Mr Andrew Willis.

SCOPE OF EVIDENCE

13 My evidence addresses:

- a. my understanding of the relevant statutory framework including the statutory tests for determining the most appropriate provisions in a district plan;
- b. the relief sought in the Council's submissions including a response to recommendations on these submissions in the s42A Report;
- c. where I am recommending an amendment to recommendations in the section 42A Report, I have included a further section 32AA evaluation of provisions in my discussion to assist the Panel.

¹ https://www.timaru.govt.nz/data/assets/pdf_file/0011/669872/Planz-2022-GMS-Residential-Review-Report.pdf

² Ibid at Appendix C

STATUTORY TESTS

- 14 Where I have recommended changes to the pTDP that have not been recommended in the section 42A report, I have incorporated an evaluation as set out at (a)-(g) below into my discussion, as the tests to be applied for determining the most appropriate provisions in a district plan:³
- a. whether the provisions accord with and assist the Council in carrying out its functions and achieve the purpose of the Act (section 74(1) of the Act);
 - b. whether the provisions accord with Part 2 of the Act (section 74(1)(b));
 - c. whether the provisions give effect to the regional policy statement (section 75(3)(c));
 - d. whether the provisions give effect to a national policy statement (section 75(3)(a));
 - e. whether the territorial authority has had regard to the actual or potential effects on the environment of activities, including, in particular, any adverse effect (section 76(3));
 - f. the extent to which the objectives are the most appropriate way to achieve the purpose of the Act (section 32(1)(a));
 - g. whether the policies and methods are the most appropriate way to achieve the objectives, having regard to their efficiency and effectiveness (section 32(1)(b)) and taking into account (under section 32(2)):
 - i. the benefits and costs of the proposed policies and methods; and
 - ii. the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules of other methods.

³ Adapted from *R Adams and Ors v Auckland Council* [2018] NZEnvC 008.

REGIONAL COUNCIL'S INTEREST AND OVERVIEW OF SUBMISSIONS IN HEARING A OF THE pTDP

- 15 The Regional Council considered that the pTDP generally gives effect to the intent of the CRPS, however the focus of the Regional Council's submission was to ensure that the CRPS and any relevant higher order planning documents are better given effect to, and to avoid any duplication or inconsistencies with the regional and national planning frameworks.
- 16 This reflects the Regional Council's statutory responsibility regarding the implementation of the CRPS under section 84(1) RMA.
- 17 My evidence also makes suggestions where I believe a change to plan provisions would better achieve the objectives of the pTDP, having regard to any relevant planning related documents adopted by the TDC, in particular the Growth Management Strategy Review.

STRATEGIC DIRECTION

Objectives

- 18 The focus of the Regional Council's submission is to ensure that the pTDP aligns with the strategic directions for the Region. This is set out in Chapter 5 of the CRPS which seeks to manage land use and development in the Region. This includes ensuring development in the Timaru District is located and designed so that it functions in a way consistent with Objective 5.2.1 of the CRPS.
- 19 Objective 5.2.1 seeks that:
Development is located and designed so that it functions in a way that:
1. **achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth;** and
 2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which:
 - a. **maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region,** including its coastal environment, outstanding natural features and landscapes, and natural values;
 - b. provides sufficient housing choice to meet the region's housing needs;

- c. encourages sustainable economic development by enabling business activities in appropriate locations;
- d. minimises energy use and/or improves energy efficiency;
- e. enables rural activities that support the rural environment including primary production;
- f. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure;
- g. avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure;
- h. facilitates the establishment of papakāinga and marae; and
- i. avoids conflicts between incompatible activities.

(emphasis added)

Matters accepted in the s42A report

SD-O1, SD-O3, and SD-O8

- 20 The Regional Council made submissions in support of Objectives 1, 3, and 8 in the Strategic Directions Chapter of the pTDP because of their consistency with the CRPS.
- 21 In response to submissions by other submitters, Mr Willis has suggested amendments to SD-O1, SD-O3 and SD-O8. I agree with his recommendations as the original intent is preserved.

SD-O4

- 22 The Regional Council submitted in support of SD-O4 as being consistent with CRPS Objective 11.3.2 and Policies 11.3.8 & 11.3.9(1) and giving effect to the CRPS natural hazards management hierarchy. No changes have been recommended to this objective and I support this.

SD-O2

- 23 SD-O2 clause iv states that: *“important landscapes and features are protected from inappropriate subdivision, use, and development”*. The Regional Council sought amendment to SD-O2 to refer to “outstanding natural features and landscapes” rather than “important landscapes”, to reflect the language of s6 RMA and give better effect to the CRPS Objectives 12.2.1 and 12.2.2. in the CRPS.

- 24 Objective 12.2.1 of the CRPS - Identification and protection of outstanding natural features and landscapes, directs that outstanding natural features and landscapes within the Canterbury Region are identified and their values are specifically recognised and protected from inappropriate subdivision, use, and development.
- 25 Objective 12.2.2 of the CRPS - Identification and management of other landscapes, directs that other important landscapes that are not outstanding natural landscapes are identified and managed.
- 26 At paragraph 98 of the section 42A report, Mr Willis states that the use of the word “important” in SD-O2 is deliberate and encompasses outstanding natural features and landscapes, as well as other landscapes. I accept that based on the premise that all outstanding landscapes and natural features are important but not all, important landscapes and natural features, are outstanding, the use of the word “important” also covers “outstanding”. I infer from Mr Willis’ comments that the objective is intended to capture both CRPS objectives 12.2.1 and 12.2.2. as well as widening SD-O2 to include “features” which is broader than ‘natural features’.
- 27 I also note that the provisions in the NFL – Natural Features and Landscapes chapter include provisions to protect outstanding natural features and landscapes (NFL-O1, NFL-P1, NFL-P4 as well as rules for activities that occur in areas covered by ONF and ONL overlays). Schedule 8 in the pTDP identifies outstanding natural landscapes in the District and Schedule 9 identifies outstanding natural features.
- 28 I therefore accept that SD-O2 in the proposed TDP is not inconsistent with the CRPS. It goes beyond the CRPS because it directs the protection of all important landscapes and features not just those that are outstanding and includes features that are not ‘natural features.’ In addition, the pTDP gives effect to s6(b) RMA and CRPS Objectives 12.2.1 and 12.2.2 in the NFL chapter of the Plan.

URBAN FORM AND DEVELOPMENT

Matters accepted in the s42A report

Objective UFD-O1

- 29 The Regional Council supported Objective UFD-O1 but requested two changes in wording.
- 30 The first requested change to the wording of UFD-O1 was to remove the current reference to versatile soils and replace it with a reference to highly productive land. The amendment was sought for consistency with the NPS-HPL terminology. I support Mr Willis' recommendation in paragraph 301 of the s42A report to change clause 7 of this objective.
- 31 The Regional Council requested change to UFD-O1 to amend the objective to recognise housing choice as an outcome for settlement patterns to reflect CRPS Objective 5.2.1b.
- 32 I support the recommendation of Mr Willis in paragraph 301 of the S42A report to amend clause 5 of this Objective.

Changes sought by the Regional Council

- 33 As noted below in paragraph 39 the Regional Council submitted that the TDC consider movement of relevant objectives and policies from the FDA chapter to the Strategic Directions (SD) and/or Urban Form and Development (UF&D) Chapter. While I accept Mr Willis' comment, in paragraph 279 of the section 42A report, that the chapters need to be read together, I believe some changes are necessary to the FDA chapter to ensure alignment and consistency between these chapters. While I realise that this hearing concerns the SD and UF&D Chapters, and not the FDA chapter, the Regional Council submission on alignment between these chapters has been addressed in this s42A report. I therefore recommend a change to the introduction of the FDA chapter (additions bold and underlined):

*This chapter addresses how future growth will be managed in the Future Development Area Overlay and how activities that could compromise future growth in the overlay will be addressed. It also addresses how urban development **and rural lifestyle development** not anticipated by the District Plan located outside the Future Development Area Overlay will be managed and how urban*

development and rural lifestyle development within the Future Development Area Overlay but out of sequence will be managed.

34 These recommended changes reflect that the FDA chapter includes a policy on unanticipated and out of sequence rural lifestyle development.

35 I recommend an additional objective be added to the FDA chapter (as FDA-O4) as set out below:

Unanticipated rural lifestyle development outside of the Future Development Overlay or out of sequence development is only considered where it is provided for through a comprehensive development area plan and where there is limited availability of land for rural lifestyle development in the applicable settlement.

36 This recommendation is made to provide an objective that sets an overarching outcome that Policy FDA-P6 implements. There is currently no objective directing unanticipated or out of sequence rural lifestyle development.

37 I recommend an additional Policy in FDA chapter to require minimum density housing:

Require development in urban Future Development Areas to achieve a minimum density of 12 households per hectare.

38 This policy supports recognition of the need for a consolidated, well designed and sustainable urban growth approach as sought by CRRPS Objective 5.2.1. It also recognises the need to use and develop natural and physical resources efficiently recognising the finite characteristics of resources such as HPL land.

Rationalisation of Plan Provisions Placement

39 The Regional Council requested amendments to objectives and policies in the Urban Form and Development chapter and requested consideration of whether some of those objectives and policies from the Future Development Area chapter might more appropriately sit in the Strategic Directions and/or Urban Form and Development Chapters. The reason for this was to have a clear framework for considering plan change applications.

40 The Regional Council also requested more detail be included to ensure that the NPS-UD is given effect and meaning in the local context.

- 41 In response Mr Willis has commented, in paragraph 279 of his report, that the SD, UFD and specific chapter provisions including those in the FDA chapter need to be read together and it is unnecessary to repeat provisions in the Strategic Directions chapter. I do not believe that it was the Regional Council's intention to request repetition of provisions, instead the intention was to consider whether provisions were sitting in the most appropriate part of the Plan. However, where the provisions sit within the Plan concerns the ease of use for Plan users. This is a matter of style rather than substance. I therefore support Mr Willis' approach that the chapters should be read together.
- 42 Mr Willis recommended that a new clause be added to UFD-O1 (paragraph 301 xii) relating to unanticipated or out of sequence urban development. This is consistent with the NPS-UD, and I support that recommendation.
- 43 I note that the pTDP currently has an objective and policies concerning unanticipated and out of sequence development. FDA-O3 is about unanticipated and out of sequence development in urban environments, while FDA-P5 implements this objective. FDA-P6 is about unanticipated and out of sequence rural lifestyle development but there is no overarching objective to set an outcome for this policy to implement.
- 44 If the introduction to the FDA chapter were amended to:
- a. reflect that it includes a policy on rural lifestyle unanticipated and out of sequence development; and
 - b. include a new objective to provide the overarching outcome, which the policy implements.
- This would help to address the Regional Council's concerns about strategic direction and support Policy FDA-P6.
- 45 I consider that the amendments I have recommended in paragraph 33 would help to address the Regional Council's concerns.
- 46 To support existing Policy FDA-P6, I have recommended an additional objective be included, as outlined in paragraph 35.
- 47 By including the new objective, I consider this is the most appropriate means of achieving the purpose of the Act, in particular ensuring the efficient use and development of natural and physical resources (s7(b)) and recognition of any finite characteristics of natural and physical

resources (s7(g)) as they relate to the highly productive land resource and other relevant characteristics of the land which are provided for through Policy FDA-P6.

- 48 It is worth noting that the development of rural lifestyle blocks on HPL is to be avoided unless it can meet the exceptions outlined in clause 3.10 NPS-HPL. Currently HPL includes LUC 1, 2 & 3. While there have been announcements from the government that they are exploring options around the definition of HPL to enable more flexibility,⁴ until such time as any changes become law, my opinion must be based on the current law.

Minimum yield of 12 HH per ha

- 49 The Regional Council requested that a policy directing a minimum yield of 12 households per hectare (HH per ha) over the area of any new urban FDAs be added to the pTDP.
- 50 I believe the way the Regional Council's original submission was worded has created confusion. In the original submission the Regional Council opposed having no minimum yield for new urban areas in the plan. However, the requested change was to include a policy to ensure that housing in FDAs is developed with a minimum yield of 12 HH per ha over the area of an FDA. I can understand why this could create confusion. There are FDAs in the anticipated RLZ zone, and the requested change did not specify that the requested policy was to apply to FDAs in the anticipated GRZ, although this was implicit in the request to add the policy to the UFD chapter.
- 51 Mr Willis considered this submission point in paragraph 281 of his report. He rejected the inclusion of a minimum yield, citing the absence of evidence as a reason. He also noted that Chapter 6 of the CRPS minimum yield requirements only apply to Greater Christchurch and not to Timaru. I agree with Mr Willis on this point and that the relevant CRPS provisions for Timaru are covered under Chapter 5.

⁴ March 2024, Ministry for the Environment, RM reform update.
<https://environment.govt.nz/news/rm-reform-update-march-2024/#highly-productive-land-proposed-changes>

- 52 Mr Willis stated that he considers it to be good planning practice to encourage or even require minimum densities of urban development where there are significant urban growth pressures and limited growth opportunities available. For the reasons set out below and in particular because of the benefits to be derived from a compact urban form, I do not agree with Mr Willis that minimum densities should be restricted to only situations where there are significant growth pressures and limited growth opportunities.
- 53 While I agree there is no apparent growth pressure at present in Timaru, there are a range of factors which can influence growth pressure in the longer term. These factors include house prices, supply, tourism, natural hazard events, cost of living, changing lifestyles and access to technology. As an example, the growth that has occurred in Selwyn District was not anticipated prior to the Christchurch earthquakes. Post-earthquakes the availability of stable greenfield land for development spurred growth in this district.
- 54 In addition, I believe there are limited growth opportunities. Timaru city and Temuka are surrounded by land currently classified as Highly Productive Land (**HPL**). Geraldine is largely surrounded by HPL but does not have HPL on its north-west side. (Refer to attachment 3).
- 55 Until a regional policy statement containing maps of HPL in the Region is operative, HPL is land zoned general rural or rural production and is classified as LUC 1, 2, or 3 land; unless it was identified for future urban development; or was subject to a Council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle at the time the NPS-HPL was notified.
- 56 The current CRPS does not contain maps of highly productive land, and therefore the transitional provisions apply. The mapping exercise is underway, and it is anticipated that the maps will be included when the proposed RPS is notified for submissions. However, as noted above, the definition of HPL is being examined. Should a change occur, that removes LUC 3 land from the definition, it is my understanding that the mapping exercise will need to accommodate that change to the national direction.
- 57 However, where HPL land has been identified for development, it is my opinion that such land needs to be developed in an efficient manner. Development needs to ensure that this important land resource is not lost to low-density development without utilising the benefits associated with

having minimum development density standards. This recognises two important aspects of s7 of the RMA; s7(b) which requires decision makers to have particular regard to the efficient use and development of natural and physical resources, and s7(g) which recognises any finite characteristics of natural and physical resources. It also recognises the need for a consolidated, well designed and sustainable urban growth as sought by CRRP Objective 5.2.1. If low-density development takes place, exhausting the supply of land available for development within FDAs sooner. This will increase pressure for future expansion on to other areas of existing HPL in the future.

- 58 In Timaru, to the south of the city and in the area surrounding Washdyke, land is classified as LUC 2. The rest of the city is surrounded by LUC 3 land. (Refer to images in Attachment 3) This means that any additional FDAs that are identified for Timaru in the future will be on to land that is currently defined as HPL.
- 59 I note that all the residential FDAs within the pTDP include LUC 2 or 3 land. If LUC 2 and 3 soils are going to be developed for urban use, it should be done by maximising yield, so that the land takes longer to use up for growth and therefore reduces further expansion in the long term onto other highly productive soils. I agree with the statement made in the Planz Consultants report⁵ to TDC that it would be prudent for TDC to front foot growth in the District. In my opinion, this includes having a minimum yield requirement for new urban areas.
- 60 I note that the Timaru District Council Growth Management Strategy Review: Residential (**TDC Growth Strategy Review**) stated that suitable density targets are appropriate to ensure that greenfield expansion land is used efficiently and to minimise the need to open up further land unnecessarily. It recommended that development densities be a requirement of developing the proposed GRZ greenfield areas in the proposed Timaru District Plan.⁶

⁵ at section 2.5, paragraph 2 *Recommendation report on chapter options regarding growth by Planz Consultants, May 2021*

⁶ at section 9.3.1 *Timaru District Council Growth Management Strategy Review: Residential* by Planz Consultants, April 2022
https://www.timaru.govt.nz/_data/assets/pdf_file/0011/669872/Planz-2022-GMS-Residential-Review-Report.pdf

- 61 I agree with the recommendations of the TDC Growth Strategy Review. Minimum yields are an important part of promoting the efficient use of land, helping to ensure that a range of housing choices are provided, that the use of existing or the development of new infrastructure occurs in an efficient manner, that the impact of urban expansion on HPL is reduced, that greater transport choice/reduced trip distances are encouraged and that there is certainty that additional residential development capacity is available to accommodate projected population and household growth.
- 62 The TDC Growth Strategy Review also reviewed minimum density requirements applied by other Councils around New Zealand and concluded that adopting a 12 HH per ha minimum net density was the appropriate level for Timaru. It stated that: *“This represents the lower end of the threshold now being considered by other local authorities as acceptable in promoting more compact and consolidated urban forms, supporting modal shifts from private cars, encouraging efficiencies in land use and infrastructure, and supporting climate change actions. This density level still enables a variety of section sizes to be provided.”*
- 63 It is my understanding that the residential development capacity modelled to be provided for by the FDAs recommended in the TDC Growth Strategy Review is based on 12 HH per ha. Having read the s32 reports, it is unclear to me why this minimum density was not carried through into the pTDP.
- 64 Including a policy requiring 12 HH per ha in new urban FDA areas is consistent with promoting sustainable management of natural and physical resources. As noted above, it enables people to develop housing to meet housing needs in a way that better protects HPL than allowing low density housing, and therefore better safeguards opportunities for future generations. However, because the 12 HH per ha is averaged over the subdivision, providing different options for section sizes is provided for, therefore enabling a variety of housing options.
- 65 Timaru is a tier 3 Local Authority, in terms of the NPS-UD, meaning it is not required to fulfil all actions required of tier 1 and 2 Local Authorities. However, Clause 1.5 of the NPS-UD strongly encourages tier 3 local authorities to do the things that tier 1 or 2 local authorities are obliged to do under Parts 2 and 3 of the NPS-UD. Regardless, the objectives and policies of the NPS-UD apply to all local authorities that have all or part of

an urban environment within their District or Region (i.e. tier 1, 2 and 3 local authorities).

- 66 Of particular relevance for consideration in making a decision to include minimum yields are NPS-UD Objectives 1, 2, 3, 6 and 8 and Policy 1. In particular, I note:
- a. Objective 1 concerns having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and in the future.
 - b. Objective 2 concerns improving housing affordability by supporting competitive land and development markets.
 - c. Objective 3 includes enabling more people to live in, areas close to employment, well serviced by public transport.
 - d. Objective 6 includes ensuring that decisions on urban development that affect urban environments are integrated with infrastructure planning and funding decisions and are strategic over the medium and long term.
 - e. Objective 8 supports reductions in greenhouse gas emissions and resilience to the effects of climate change.
 - f. Policy 1 aims for well-functioning urban environments which meet the needs of people including in terms of type, price, location, different households, good accessibility, supporting reductions in greenhouse gas emissions.
- 67 Including minimum density yields would give greater certainty to achieving the outcomes sought through the objectives of the NPS-UD and implement the policy direction for a well-functioning urban environment as set out in Policy 1. It would also be consistent with clause 3.6(5) of the NPS-HPL where Territorial Authorities are required to take measures to ensure spatial extent of any urban zone covering HPL is the minimum necessary to provide the required development capacity while achieving a well-functioning environment.
- 68 Requiring 12 HH per ha will help to achieve Objective 5.2.1, Policy 5.3.1 and 5.3.12 of the CRPS by: supporting consolidated, sustainable new urban growth close to existing urban areas, providing sufficient housing choice and helping to reduce pressure to develop on HPL.

- 69 A policy directing a minimum density of 12HH per ha is also a tool to assist in the implementation of some of the objectives in the pTDP. It should help to ensure that there is sufficient residential development capacity in existing and proposed urban areas to meet demand and household choice which is consistent with SD-O1 of the pTDP. It is also consistent with UFD-O1 because it efficiently accommodates future growth and capacity, provides for a more efficient use of infrastructure than allowing lower density housing, potentially reduces adverse effects on the environment because higher density housing better supports public transport and therefore has potential to reduce carbon emissions and minimises the loss of HPL soils.
- 70 Regarding the suggestion in the section 42A report that minimum density could be resolved at the plan change stage on a case-by-case basis, I strongly disagree that this is an appropriate outcome. That is because:
- a. It provides no certainty as to yield;
 - b. There is no policy guidance warranting such an approach, and as such the Council would have little ability to influence the outcomes;
 - c. Significant resources are often committed to plan preparation, and the ability to influence the outcomes of a plan change process will be limited to the scope of submissions on it; and
 - d. Such an approach is not, in my view, strategic, nor does it reflect an approach that is consistent with the TDC Growth Strategy Review.
- 71 I note Mr Willis' comments in the penultimate sentence of paragraph 281 section that further submitters have commented that having a minimum yield is "too prescriptive and inflexible, could prevent innovative land development solutions and may not be appropriate on the fringes of smaller townships and make developments possible only by large developers rather than enabling more bespoke developments." Mr Willis recommended rejecting these further submissions on the basis of an absence of evidence. While I support his recommendation to reject the further submissions, I also note that the five further submissions that made comments of this nature all referred to the 12 HH per ha not being appropriate in the Rural Lifestyle Zone (**RLZ**). The Regional Council submission only concerned new urban development. (The relevant further submission comments are included as **Attachment 5**).

- 72 I also note that there was support for the Regional Council's submission, with a Further Submission from Milward Finlay Lobb requesting that the Urban Form and Future Development Chapter be amended to include a policy to ensure that housing in Residential Future Development Areas is developed with a minimum yield of 12 household per hectare over the area of an FDA, and provide for a range of densities within the FDA to ensure that housing choice is provided within new development areas. Kainga Ora also supported the Regional Council's submission.
- 73 In conclusion, I recommend the inclusion of a policy directing a 12HH per ha minimum yield for new urban areas as outlined in paragraph 37 of this evidence.

Dated this 22nd day of April 2024



Deidre Francis

ATTACHMENT 1
STATUTORY FRAMEWORK

(The following provisions have been referred to in this evidence)

RMA 1991:

s31 Functions of territorial authorities under this Act

- (1) Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:
- (a) the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district:
 - (aa) the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district:
 - (b) the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of—
 - (i) the avoidance or mitigation of natural hazards; and
 - (ii) *[Repealed]*
 - (ia) the prevention or mitigation of any adverse effects of the development, subdivision, or use of contaminated land:
 - (iii) the maintenance of indigenous biological diversity:
 - (c) *[Repealed]*
 - (d) the control of the emission of noise and the mitigation of the effects of noise:
 - (e) the control of any actual or potential effects of activities in relation to the surface of water in rivers and lakes:
 - (f) any other functions specified in this Act.
- (2) The methods used to carry out any functions under subsection (1) may include the control of subdivision.

s32 (1) (a)

An evaluation report required under this Act must

- (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act;

- (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—
 - (i) identifying other reasonably practicable options for achieving the objectives; and
 - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
 - (iii) summarising the reasons for deciding on the provisions

s32 (2)

An assessment under subsection (1)(b)(ii) must—

- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—
 - (i) economic growth that are anticipated to be provided or reduced; and
 - (ii) employment that are anticipated to be provided or reduced; and
- (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and
- (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

s32AA Requirements for undertaking and publishing further evaluations

- (1) A further evaluation required under this Act—
 - (a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the **changes**); and
 - (b) must be undertaken in accordance with [section 32\(1\) to \(4\)](#); and
 - (c) must, despite paragraph (b) and [section 32\(1\)\(c\)](#), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and
 - (d) must—
 - (i) be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or
 - (ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.

- (2) To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii).
- (3) In this section, **proposal** means a proposed statement, national planning standard, plan, or change for which a further evaluation must be undertaken under this Act.

s74 Matters to be considered by territorial authority

- (1) A territorial authority must prepare and change its district plan in accordance with—
 - (b) its functions under [section 31](#); and
 - (c) the provisions of [Part 2](#); and
 - (d) a direction given under [section 25A\(2\)](#); and
 - (e) its obligation (if any) to prepare an evaluation report in accordance with [section 32](#); and
 - (f) its obligation to have particular regard to an evaluation report prepared in accordance with [section 32](#); and
- (ea) a national policy statement, a New Zealand coastal policy statement, and a national planning standard; and
- (g) any regulations.

s75 Contents of district plans

s75(3) A district plan must give effect to—

- (a) any national policy statement; and
- (b) any New Zealand coastal policy statement; and
- (ba) a national planning standard; and
- (c) any regional policy statement.

s76 District rules

- (2) In making a rule, the territorial authority shall have regard to the actual or potential effect on the environment of activities including, in particular, any adverse effect.

NATIONAL POLICY STATEMENTS:

National Policy Statement on Urban Development 2020 – (May 2022)

Part 1: Preliminary provisions

1.3 Application

This National Policy Statement applies to:

- (a) all local authorities that have all or part of an urban environment within their district or region (ie, tier 1, 2 and 3 local authorities); and
- (b) planning decisions by any local authority that affect an urban environment. However, some objectives, policies, and provisions in Parts 3 and 4 apply only to tier 1, 2, or 3 local authorities.

1.5 Implementation by tier 3 local authorities

- (1) Tier 3 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 so.

Part 2: Objectives and policies

1.1 Objectives

Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.

Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- (a) the area is in or near a centre zone or other area with many employment opportunities
- (b) the area is well-served by existing or planned public transport
- (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.

Objective 6: Local authority decisions on urban development that affect urban environments are:

- (a) integrated with infrastructure planning and funding decisions; and

- (b) strategic over the medium term and long term; and
- (c) responsive, particularly in relation to proposals that would supply significant development capacity.

Objective 8: New Zealand's urban environments:

- (a) support reductions in greenhouse gas emissions; and
- (b) are resilient to the current and future effects of climate change.

1.2 Policies

Policy 1: 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

Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

Part 3: Implementation

Subpart 1 – Providing development capacity

3.2 Sufficient development capacity for housing

- (1) Every tier 1, 2, and 3 local authority must provide at least sufficient development capacity in its region or district to meet expected demand for housing:
 - (a) in existing and new urban areas; and
 - (b) for both standalone dwellings and attached dwellings; and
 - (c) in the short term, medium term, and long term.
- (2) In order to be sufficient to meet expected demand for housing, the development capacity must be:
 - (a) plan-enabled (see clause 3.4(1)); and
 - (b) infrastructure-ready (see clause 3.4(3)); and
 - (c) feasible and reasonably expected to be realised (see clause 3.26); and

Subpart 2 – Responsive planning

3.8 Unanticipated or out-of-sequence developments

- (1) This clause applies to a plan change that provides significant development capacity that is not otherwise enabled in a plan or is not in sequence with planned land release.
- (2) Every local authority must have particular regard to the development capacity provided by the plan change if that development capacity:
 - (a) would contribute to a well-functioning urban environment; and
 - (b) is well-connected along transport corridors; and
 - (c) meets the criteria set under subclause (3).

National Policy Statement for Highly Productive Land 2022 (September 2022)

Part 2: Objective and Policies

2.1 Objective

Objective: Highly productive land is protected for use in land-based primary production, both now and for future generations.

1.3 Policies

Policy 1: Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production.

Policy 4: The use of highly productive land for land-based primary production is prioritised and supported.

Policy 5: The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.

Policy 7: The subdivision of highly productive land is avoided, except as provided in this National Policy Statement.

Policy 8: Highly productive land is protected from inappropriate use and development.

3.2 Integrated management

(1) Regional councils and territorial authorities must identify highly productive land, and manage the effects of subdivision, use, and development of highly productive land, in an integrated way, which means: ...

(c) taking a long-term, strategic approach to protecting and managing highly productive land for future generations.

3.5 Identifying highly productive land in regional policy statements and district plans

(7) Until a regional policy statement containing maps of highly productive land in the region is operative, each relevant territorial authority and consent authority must apply this National Policy Statement as if references to highly productive land were references to land that, at the commencement date:

(a) is

(i) zoned general rural or rural production; and

- (ii) LUC 1, 2, or 3 land; but
- (b) is not:
 - (i) identified for future urban development; or
 - (ii) subject to a Council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle.

1.3 Interpretation

identified for future urban development means:

- (a) identified in a published Future Development Strategy as land suitable for commencing urban development over the next 10 years; or
- (b) identified:
 - (i) in a strategic planning document as an area suitable for commencing urban development over the next 10 years; and
 - (ii) at a level of detail that makes the boundaries of the area identifiable in practice

3.6 Restricting urban rezoning of highly productive land

- (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.

Canterbury Regional Policy Statement 2013

5.2 OBJECTIVES

5.2.1 Location, Design and Function of Development (Entire Region)

Development is located and designed so that it functions in a way that:

1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and
2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which:
 - a. maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values;
 - b. provides sufficient housing choice to meet the region's housing needs;
 - c. encourages sustainable economic development by enabling business activities in appropriate locations;
 - d. minimises energy use and/or improves energy efficiency;
 - e. enables rural activities that support the rural environment including primary production;
 - f. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure;
 - g. avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure;
 - h. facilitates the establishment of papakāinga and marae; and i. avoids conflicts between incompatible activities.

5.3 POLICIES

5.3.1 Regional growth (Wider Region)

To provide, as the primary focus for meeting the wider region's growth needs, sustainable development patterns that:

1. ensure that any
 - a. urban growth; and
 - b. limited rural residential developmentoccur in a form that concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development;
2. encourage within urban areas, housing choice, recreation and community facilities, and business opportunities of a character and form that supports urban consolidation;
3. promote energy efficiency in urban forms, transport patterns, site location and subdivision layout;
4. maintain and enhance the sense of identity and character of the region's urban areas; and
5. encourage high quality urban design, including the maintenance and enhancement of amenity values.

5.3.12 Rural production (Wider Region)

Maintain and enhance natural and physical resources contributing to Canterbury's overall rural productive economy in areas which are valued for existing or foreseeable future primary production, by:

1. avoiding development, and/or fragmentation which;
 - a. forecloses the ability to make appropriate use of that land for primary production; and/or
 - b. results in reverse sensitivity effects that limit or precludes primary production ...

12.2 OBJECTIVES

12.2.1 Identification and protection of outstanding natural features and landscapes

Outstanding natural features and landscapes within the Canterbury region are identified and their values are specifically recognised and protected from inappropriate subdivision, use, and development.

12.2.2 Identification and management of other landscapes

The identification and management of other important landscapes that are not outstanding natural landscapes. Other important landscapes may include:

1. natural character
2. amenity
3. historic and cultural heritage

**ATTACHMENT 2
RECOMMENDED AMENDMENTS TO pTDP**

1. Recommended change to the introduction of the FDA chapter (additions bold and underlined):

*This chapter addresses how future growth will be managed in the Future Development Area Overlay and how activities that could compromise future growth in the overlay will be addressed. It also addresses how urban development **and rural lifestyle development** not anticipated by the District Plan located outside the Future Development Area Overlay will be managed and how urban development **and rural lifestyle development** within the Future Development Area Overlay but out of sequence will be managed.*

2. Recommended additional objective for the FDA chapter (as FDA-O4) as set out below:

Unanticipated rural lifestyle development outside of the Future Development Overlay or out of sequence development is only considered where it is provided for through a comprehensive development area plan and where there is limited availability of land for rural lifestyle development in the applicable settlement.

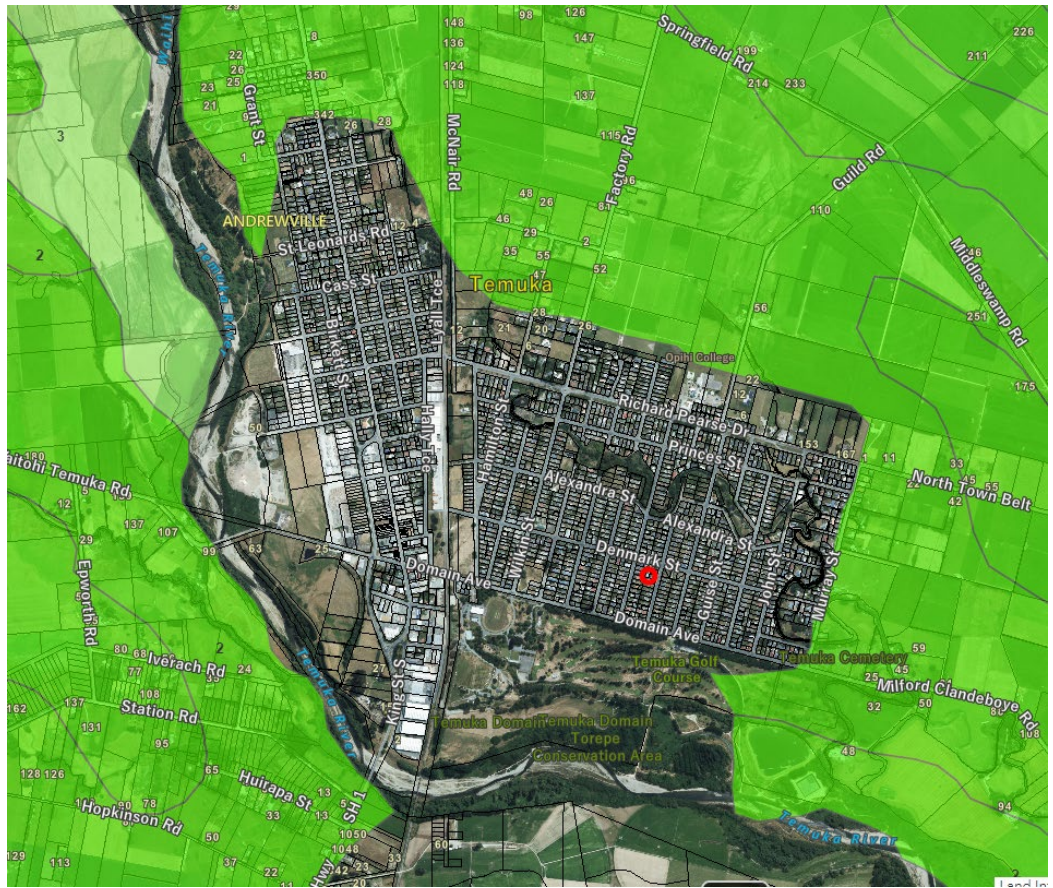
3. Recommended additional Policy in FDA chapter to require minimum density housing.

Require development in urban Future Development Areas to achieve a minimum density of 12 households per hectare.

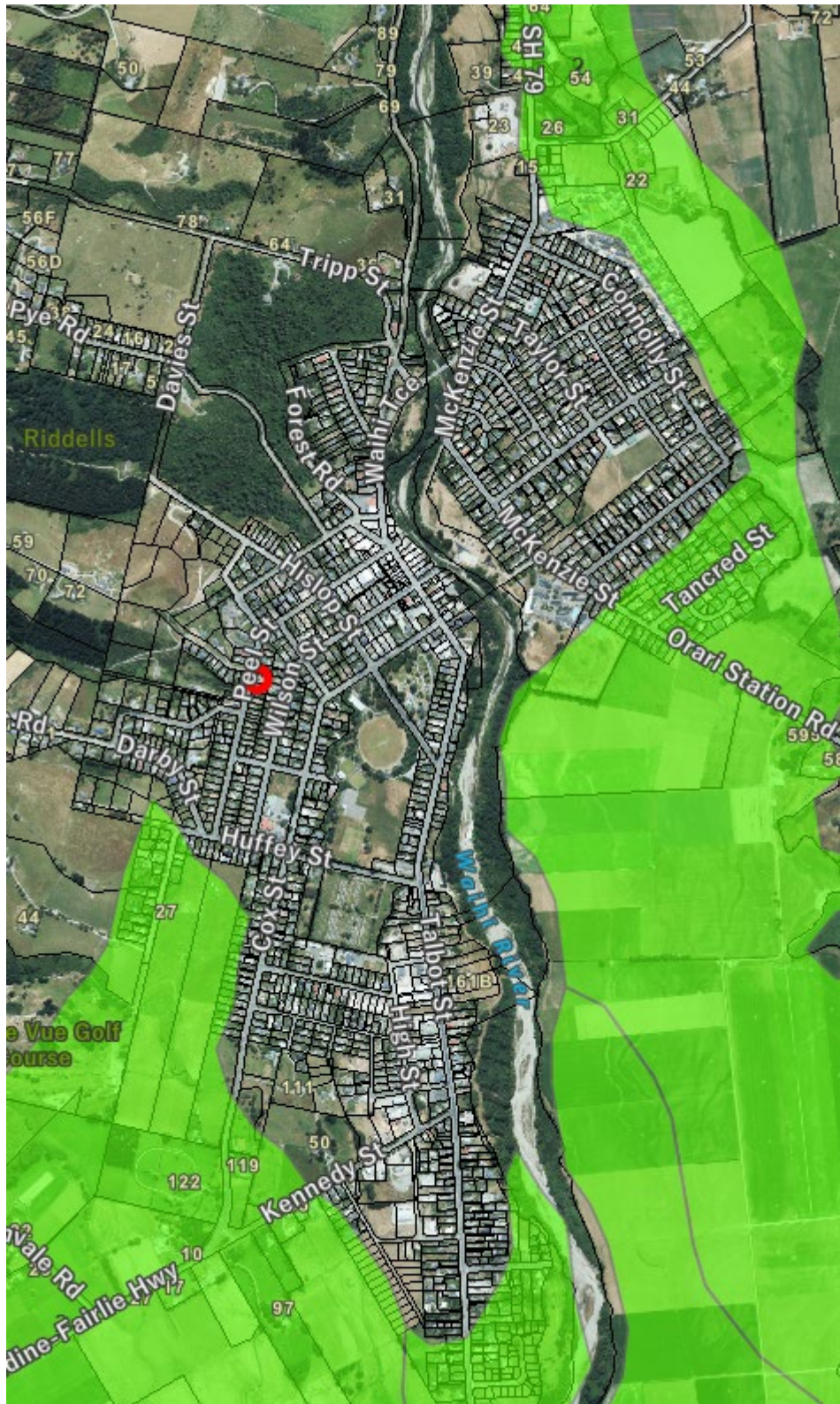
**ATTACHMENT 3
SNIPS FROM CANTERBURY MAPS SHOWING LUC 2 & 3 SOILS AROUND
TIMARU DISTRICT TOWNS**



Highly Productive Land around Timaru



Highly productive land around Temuka



Highly Productive Land around Geraldine

**ATTACHMENT 4
AMENDMENTS SOUGHT THROUGH THE ORIGINAL REGIONAL COUNCIL
SUBMISSION**

Suggested amendments in **black and bold**, additions underlined and deletions with a ~~strike through~~.

Strategic Direction Chapter				
<i>Plan Section</i>	<i>Plan Provision</i>	<i>Requested Action</i>	<i>Reasoning</i>	<i>Relief Sought</i>
District Wide Matters Strategic Direction	SD-01	Support	This Objective is consistent with CRPS Objective 5.2.1. Particularly support clauses ii & iii	Retain as notified or preserve the original intent.
District Wide Matters Strategic Direction	SD-02	Amend	This Objective is consistent with CRPS objectives 8.2.4, 9.2.3, 12.2.2 & 13.2.1. However, the objective only refers to important landscapes and not outstanding natural features and landscapes and is therefore inconsistent with CRPS Policy 12.2.1.	Amend to include reference to the identification and protection of outstanding natural features and landscapes.
District Wide Matters Strategic Direction	SD-03	Support	The Regional Council supports the specific consideration of climate change and an integrated management approach and note it is consistent with CRPS Objective 11.2.3	Retain as notified or preserve the original intent.
District Wide Matters Strategic Direction	SD-04	Support	This Objective is consistent with CRPS Objective 11.3.2 and Policies 11.3.8 & 11.3.9(1) and gives effect to the CRPS natural hazards management hierarchy.	Retain as notified or preserve the original intent.
District Wide Matters Strategic Direction	SD-08	Support	This objective is consistent with CRPS Policy 5.2.2.	Retain as notified or preserve the original intent.

Urban Form and Development Chapter				
<i>Plan Section</i>	<i>Plan Provision</i>	<i>Requested Action</i>	<i>Reasoning</i>	<i>Relief Sought</i>
District Wide Matters Urban Form and Development	UFD-O1	Amend	The Regional Council generally supports this objective but notes that the reference to versatile soils needs to be changed to refer to highly productive land to be consistent with the NPS for highly productive land 2022. Objective UFD-O1 should be amended to address housing choice to reflect Objective 5.2.1b of the CRPS.	Amend the objective clause vii as follows: vii. minimises the loss of versatile soils <u>protects highly productive land</u> ; All references in the Plan to "versatile soils" should be changed to "highly productive land" and the provisions made consistent with the NPSHPL2022. Amend the objective to recognise housing choice as an outcome for settlement patterns.
District Wide Matters Urban Form and Development	Whole Chapter	Amend	A number of the objectives and policies in the Future Development Area chapter are relevant at a strategic level, and should be incorporated in the Strategic Directions chapter, and/or the Urban Form and Development chapter. Those two chapters are extremely important when considering applications for private plan changes. In addition, more detail is required to ensure that the National Policy Statement on Urban Development is given	Reconsider the objectives and policies and consider movement of relevant objectives and policies from the Future Development Areas chapter to the Strategic Directions chapter and/or Urban Form and Development Chapter, and ensure the provisions give effect to the NPS-UD and meaning is provided in the local context.

			effect, and meaning in the local context.	
District Wide Matters Urban Form and Development		Amend	There is no minimum yield for new urban areas in the plan. Minimum yields are an important part of ensuring that a range of housing choices are provided, that infrastructure is developed in an efficient manner, and that the rural land resource on the urban fringe is also developed so that it is maximised. This also contributes to a compact urban form, and ensuring that a range of densities are built also contributes to housing affordability.	Include a policy to ensure that housing in Future Development Areas are developed with a minimum yield of 12 household per hectare over the area of an FDA, and provide for a range of densities within the FDA to ensure that housing choice is provided within new development areas.

ATTACHMENT 5
FURTHER SUBMISSIONS CONCERNING THE REGIONAL COUNCIL'S
SUBMISSION REQUEST (183.21) FOR 12HH per ha MINIMUM DENSITY IN
NEW URBAN AREAS:

Submissions in Support:

Submitter 60: Milward Finlay Lobb

Submission:

Support for minimum yield requirements within Residential Future Development Areas and to provide for a mix of housing densities.

Request:

Amend the Urban Form and Future Development Chapter to include a policy UFD-PX, to ensure that housing in Residential Future Development Areas is developed with a minimum yield of 12 household per hectare over the area of an FDA, and provide for a range of densities within the FDA to ensure that housing choice is provided within new development areas.

Submitter 229: Kainga Ora

Submission:

Kāinga Ora supports the inclusion of minimum yields to support intensification at a level that supports housing choice.

Request:

Allow RC request

Submissions in Opposition:

Submitter 85: John & Linda Badcock

Submission:

While we support efforts to maximise limited RLZ resources, the policy proposed by ECan (of 12 households per ha for RLZ) is too prescriptive and inflexible. This policy will restrict Council's discretion and lead to perverse outcomes, preventing the ability to achieve innovative land development solutions for Geraldine and across the district.

Request:

A more nuanced / locally relevant set of rules is required in terms of housing density / development yield, that recognises the need to innovate and work with specific site characteristics.

Submitter 108: George Harper et al.

Submission:

While we support efforts to maximise limited RLZ resources, the policy proposed by ECan is too prescriptive and inflexible. A density of 12 household per hectare may be suitable for the fringes of major urban centres and may, or may not, be suitable on the fringes of smaller rural townships. Overall, however, the policy will restrict Council's discretion in consenting, prevent achieving innovative development solutions and will lead to perverse outcomes such as making developments possible only by large developers with vast resources. Smaller, more bespoke developments will be prevented with such a prescriptive policy.

Request:

A more nuanced set of rules is required in terms of housing density / development yield.

Submitter 138: Steve & Yanna Houward Sullivan

Submission:

While we support efforts maximise limited RLZ resources, the policy proposed by ECan (of 12 households per ha for RLZ) is too prescriptive and inflexible. This policy will restrict Council's discretion and lead to perverse outcomes, preventing the ability to achieve innovative land development solutions for Geraldine and across the district.

Request:

A more nuanced / locally relevant set of rules is required in terms of housing density / development yield, that recognises the need to innovate and work with specific site characteristics.

Submitter 160: David Alexander & Susanne Elizabeth Payne

Submission:

While we support efforts to maximise limited RLZ resources, the policy proposed by ECan is too prescriptive and inflexible. A density of 12 household per hectare may be suitable for the fringes of major urban centres and may, or may not, be suitable on the fringes of smaller rural townships. Overall, however, the policy will restrict Council's discretion in consenting, prevent achieving innovative development solutions and will lead to perverse outcomes such as making developments possible only by large developers with vast resources. Smaller, more bespoke developments will be prevented with such a prescriptive policy.

Request:

A more nuanced set of rules is required in terms of housing density / development yield.

Submitter 273: Bruce & Sharon Robertson**Submission:**

While we support efforts to maximise limited RLZ resources, the policy proposed by ECan (of 12 households per ha for RLZ) is too prescriptive and inflexible. This density may be acceptable on the fringes of major urban centres but may not be suitable on the boundaries of small rural townships such as Geraldine. This policy will restrict Council's discretion and lead to perverse outcomes, preventing the ability to achieve innovative land development solutions for Geraldine and across the district. It would also likely prevent the more "bespoke" developments by landowners and result in developments only being progressed by well-resourced development companies who would likely focus on the larger urban area of Timaru city.

Request:

A more nuanced / locally relevant set of rules is required in terms of housing density / development yield, that recognises the need to innovate and work with specific site characteristics and land owners.