

milward finlay lobb



Memorandum for Hearing G

Client	JR & JJ Ford KW & SM Pyke SM Fraser, ML Robinson & PA Brown MLS & RE Talbot PG & JA Wilkins and GJA Proudfoot GW & DS Craig DI & CI Mackenzie
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Address	333, 355, 365 375, 385, 397 and 403 Pages Road, Timaru
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MAY IT PLEASE THE PANEL

Summary

- 1.0 This submission is prepared on behalf of JR & JJ Ford, KW & SM Pyke, S M Fraser, ML Robinson & PA Brown, MLS & RE Talbot, PG & JA Wilkins & GJA Proudfoot, GW & DS Craig, DI & CI Mackenzie, to address the Future Development Area 10 (FDA-10) proposed as part of the Proposed Timaru District Plan (PTDP).
- 2.0 This submission proposes that FDA-10 be extended to encompass the northern portions of land parcels currently included in FDA-10. The area of land comprises 21ha and would enable Rural Lifestyle Allotments to be achieved.
- 3.0 In response to Council's s42A Report, the revised proposal limits the minimum allotment size to be 2ha, with further information provided on three waters servicing.

Experience and Overview

- 4.0 My name is Andrew Scott Rabbidge, I am a Director of Milward Finlay Lobb Limited, an engineering, surveying and planning consultancy. I hold a Bachelor of Surveying (Credit) from the University of Otago (1995). *Please refer to Appendix 1 for further qualifications and experience.*
- 5.0 My experience in land development as a consultant includes a wide range of subdivision applications throughout the central South Island and spans 30 years.
- 6.0 This submission does not form expert planning evidence. Rather, it is a response to the s42A Report and a memorandum to be tabled to the hearings panel for Hearing G (Growth and Future Development Areas).
- 7.0 I do not wish to be heard at the hearing.

Background and Clarification of the Proposal

- 8.0 The submission relates to the following land parcels:
333 Pages Road – Lot 2 DP 82367 (9.52ha) (PG & JA Wilkins & GJA Proudfoot)
355 Pages Road – Lot 2 DP 82024 (6.57ha) (JJ & JR Ford)
365 Pages Road – Lot 3 DP 78854 & Lot 1 DP 82024 (12.80ha) (GW & DS Craig)
375 Pages Road – Lot 2 DP 73340 (9.86ha) (KW & SM Pyke)
385 Pages Road – Lot 1 DP 352790 & Lot 1 DP 301203 (1.59ha) (SM Fraser, ML Robinson & PA Brown)



397 Pages Road – Lot 10 DP 3898 (2.53ha) (DI & CI Mackenzie)

403 Pages Road – Lot 9 DP 3898 (2.33ha) (MLS & RE Talbot)

- 9.0 The southern portions of the above land parcels adjoining Pages Road are located within the FDA-10 boundary. The northern extents comprise ~21ha and the land is zoned General Rural Zone (GRUZ) in the Proposed Timaru District Plan. The sites all have vehicle access from Pages Road.
- 10.0 The submitters propose a control in the extended area of FDA-10 that would restrict the minimum lot size to 2ha, allowing for larger lifestyle lots.
- 11.0 The site is located ~260m from land subject to an active resource consent for subdivision in the GRUZ, creating 13 rural lifestyle allotments and one allotment for recreation and conservation purposes to the north of the subject sites (Greenridge Farm Ltd, 101/102.2021.168.1). The subdivision consent, with the 509 Pages Road subdivision, will create an area of rural-residential development with lot sizes being between 1.51ha-4.43ha near the subject sites.
- 12.0 Connection to a water supply can be achieved via an extension of Council's existing rural water reticulation network (Downlands Water Main) which already provides potable and stock water for the subject properties. If any further connections to the Downloads Water Supply were to be confirmed, a financial contribution shall be paid to Council for any upgrade to accommodate the increased demand.
- 13.0 Wastewater disposal is anticipated to be discharged to ground in accordance with the provisions of the Canterbury Regional Council Land and Water Regional Plan (CLWRP), and AS/NZS 1547 : 2012. The proposed 2ha lot sizes would provide sufficient space to accommodate this discharge within site boundaries, and occupiers would need to obtain consent under the CLWRP (based on 2ha proposed lot sizes).
- 14.0 The discharge of stormwater to ground would be expected to be compliant with the permitted activity conditions of the CLWRP.
- 15.0 The environment, when resource consent 101.2021.168.1 is given effect to, would have a similar character to a Rural Lifestyle Zone, and not reflective of the General Rural Zone as notified. Resulting in a rural lifestyle character to the north and south recognised by the FDA overlay and nearby subdivision consent.

Response to s42A Report

- 16.0 I agree with section 10.10.11 of Mr Bonis' s42A Report, relating to the notified zoning, biodiversity, cultural and heritage.



Hazards

- 17.0 I disagree with the risk posed by **Hazards** sought by Environment Canterbury. Natural depressions exist on the site and exist on most undeveloped greenfield land. The Flood Assessment Area (FAA) can be managed through design of the FDA layout and subsequent subdivision applications. The extent of the FAA's does not limit the Rural Lifestyle Density and are common in land development projects throughout the District. I do not see this as being a restriction on the extension of the FDA boundary into the Submitters' site.

Landscape Values

- 18.0 Section 10.10.12(b) of the s42A report states that the landscape character exhibits rural openness and rural amenity, and that extension of the FDA10 would result in out-of-character sprawl. I am not an expert in this field, but would like to point out that:
- 19.0 There are no landscape, amenity, natural character or biodiversity overlays on the submitters sites in the PTDP.
- 20.0 The surrounding environment has rural lifestyle properties adjoining Pages Road to the south of varying lot sizes (0.8ha - 2.2ha). Sites to the northeast along Kellands Hill Road are ~1ha in area. The Greenridge Farm subdivision consent may in the future further contribute a rural lifestyle landscape character within the vicinity of the submitters sites.

Infrastructure

- 21.0 Regarding provision for three waters servicing, as set out above, the proposal would achieve either connection to the Council reticulated network or contained and managed within the site as per a regional consent or within permitted limits.
- 22.0 If connection to the nearby Downloads Water Supply were to be confirmed, a financial contribution shall be paid to Council for any extension of servicing and/or upgrade to accommodate the increased demand.
- 23.0 Stormwater will be discharged and infiltrate to ground in accordance with permitted limits of the CLWRP.
- 24.0 Wastewater will be disposed of by a private on-site wastewater management system in accordance with a resource consent from Environment Canterbury. This would be consistent with the Proposed District Plan provision requiring a density of 1 residential unit/2ha for unreticulated Rural Lifestyle development.



National Policy Statement on Urban Development (NPS-UD)

- 25.0 The National Policy Statement on Urban Development (NPS-UD) requires councils to provide for well-functioning urban environments and to enable growth in a responsive manner, particularly where it contributes to meeting demand for housing and lifestyle opportunities.
- 26.0 The proposed extension to FDA-10 aligns with Policy 8 of the NPS-UD, which directs local authorities to be responsive to plan changes that add development capacity and contribute to a well-functioning urban environment, even if the development is unanticipated by RMA planning documents.
- 27.0 The subject sites are immediately adjacent to FDA10 and existing rural lifestyle development and is accessible for three waters infrastructure. The surrounding environment is transitioning to a rural lifestyle character, supported by the recent subdivision consent in the vicinity (Greenridge Farm) and 509 Pages Road.
- 28.0 The proposed 2ha minimum lot size provides for low-density rural lifestyle development, consistent with the local pattern of development, while efficiently utilising existing infrastructure.
- 29.0 The proposal provides a reasonable extension to FDA-10, enabling rural lifestyle development in a manner that responds to current demand and supports the intent of the NPS-UD to provide choice in housing and development typologies.

National Policy Statement on Highly Productive Land (NPS-HPL)

- 30.0 The National Policy Statement on Highly Productive Land (NPS-HPL) applies to the site as the site is classed as having LUC-3 soils. While I am not an expert in this field, I raise the following point:
- 31.0 Each site comprises approximately 9ha, this limits the potential for intensive arable farming, horticulture, or larger-scale operations typically associated with highly productive land. The site size reflects a pattern of land fragmentation that Hadlow has experienced over the past 25 years and constrains the productive potential of these sites. The size of the sites and surrounding lifestyle allotments result in limited practical productive use.

Canterbury Regional Policy Statement (CRPS)

- 32.0 Chapter 5 of the CRPS provides a strategic framework for development which results in changes to urban, rural-residential and rural areas, together with infrastructure which supports this development.



- 33.0 Objective 5.2.1 which seeks to establish development that achieves consolidated and well-designed growth in and around urban areas. Policy 5.3.1 seeks to achieve sustainable development patterns which ensure that any *'...limited rural residential development occurs in a form that concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development'*.
- 34.0 Policy 5.3.5 seeks to ensure that development is appropriately serviced for potable water, stormwater and sewage, while avoiding or mitigating adverse effects on the environment and human health. The CRPS directs territorial authorities, when considering rezoning land to enable more intensive development, to ensure that servicing can be efficiently provided.
- 35.0 The proposal is consistent with the relevant provisions of the CRPS as it will enable limited rural residential development which is well connected to urban areas and can either be serviced by essential infrastructure or it can be established in a way that avoids adverse impacts to the environment or human health.

Proposed Timaru District Plan, Strategic Directions

- 36.0 The Proposed Timaru District Plan (PTDP) gives effect to the Canterbury Regional Policy Statement (CRPS) through its high-level Strategic Directions. In alignment with the CRPS, Strategic Direction SD-O1 supports limited rural lifestyle development where it is located adjacent to existing urban areas, follows a coordinated development pattern, and is efficiently connected to reticulated sewer and water infrastructure.
- 37.0 This proposal is consistent with SD-O1 as it represents an appropriate extension that respects existing title boundaries and supports a coordinated, cohesive future development area. As outlined in this submission, the subject sites are capable of achieving connection to reticulated water infrastructure and can accommodate on-site wastewater and stormwater collection, management and disposal.

Conclusion

- 38.0 This submission asks that the zoning for FDA-10 that is proposed for the Pages Road area be extended to include the subject sites.



Appendix 1

Qualifications and Experience

- 1.1. My name is Andrew Scott Rabbidge. I am a Director of Milward Finlay Lobb Ltd (MFL) based in Timaru since January 1999, having commenced employment with MFL in late 1995.
- 1.2. I am a Licensed Cadastral Surveyor (July 1998) and Registered Professional Surveyor (2005) with almost 30 years of planning, surveying, engineering and land development experience throughout the Central and lower South Island.
- 1.3. My professional qualification is a Batchelor of Surveying (Credit) from Otago University (1995).
- 1.4. I am a full member of Survey and Spatial New Zealand (1995), a member of the Consulting Surveyors of New Zealand (1999) and an Associate member of the New Zealand Planning Institute (2012).
- 1.5. I have extensive experience in Planning, Rural and Residential subdivision, land development and project management throughout Canterbury and Otago. This includes almost 30 years of professional working knowledge of the Operative Timaru District Plan since late 1995.