

BEFORE THE

TIMARU DISTRICT COUNCIL HEARING COMMITTEE

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of the Proposed Timaru District Plan

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MEMO BY KEVIN THOMAS KEMP

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**Introduction**

- 1 My name is Kevin Kemp. I am currently the Stormwater Team Leader at Timaru District Council (TDC). My Qualifications and Experience were outlined previously in my evidence for Hearing G as contained in the s42a report.
- 2 This response has been provided in accordance with Minute 42, which stated at [7]:  
  
*‘We direct that the technical report authors provide their summary statements, along with any further responses from matters arising at the Hearing’.*
- 3 I have been asked by Mr Bonis to consider the additional Three Waters evidence only, provided by the submitters. Please find my consideration of additional three waters evidence within Annexure A.
- 4 I confirm I have read the Code of Conduct for expert witnesses contained in the Environment Court New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this 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.



**Kevin Kemp**

22 July 2025

## Annexure A

### Pleasant Point

Sub No.	Submitter	Address
231	T Blackler	10 Burke Street, Pleasant Point
Rezoned to General Residential Zone (GRZ) or Future Urban Zone. 10.6Ha.		
No Additional data provided, no change to original assessment to <b>Recommend to reject rezoning to GRZ.</b>		

### Geraldine

Sub No.	Submitter	Address
19	Waitui Deer Farm	Geraldine Downs
Rural Lifestyle Zone – with SCA min allotment 2ha. Extend 2ha min to all 10ha areas.		
<b>Water:</b> The full site is approximately 115ha which at 2ha blocs would be approximately 57 new connections. Full hydraulic assessment of the servicing capacity of the respective Te Moana subschemes (The Downs and Headworks) to serve the areas of interest would be required, and has not been provided.		
<b>Sewer:</b> Reference to use of composting toilets would be at the developer's discretion, but would be dependent on compliance certification from the Regional Council. As stated in initial evidence on-site blackwater holding tanks are not practicable given constraints on Geraldine disposal options.		
Considered that sufficient information and analysis has not been provided given matters raised in initial evidence. <b>The recommendation to reject is retained.</b>		

Sub No.	Submitter	Address
128	Scott	FDA3 Geraldine
Rezoned FDA3 to GRZ now.		
No additional Three Waters information supplied.		
<b>Recommendation to reject immediate rezoning to GRZ remains</b> as stated in initial evidence, due to a lack of a Development Area Plan and associated planning framework for the development area and no confidence provided by the submitter on funding for Three Waters services to the subject site.		
No funding exists to support the immediate re-zoning and there is a lack of detail as to how the proposal will be achieved in a manner that ensures the integrity of the existing network and apportioning of associated costs to the developer.		

Sub No.	Submitter	Address
72	Lee Anne Burdon	73 Connelly Street, Geraldine.
Provide as an extension to FDA3. 8.87Ha		
No Infrastructure Data supplied other than DRAFT Proposed Residential Expansion Plan (Page 17).		
<b>No comment on requested relief.</b>		

Sub No.	Submitter	Address
160	Payne	FDA11 Geraldine
109	Harper	
108	Joint Group	
Rezone FDA11 to RLZ now. Amending proposal – accepts limits on min size but seeks 1.5ha rather than 2ha as recommended in s42A Report. 56ha		
<b>Water:</b> Reallocation of existing Geraldine Flat – Te Moana Water Supply units can be accommodated. Any new units over and above the existing allocated supply would require a hydraulic assessment confirm availability.		
<b>Sewer:</b> On-site wastewater management may be possible through ECAN pathways. Cumulative effects on groundwater assessment could begin to impact developments in later stages. I am not prepared to comment further on impact to On-site wastewater management between 2ha and 1.5ha minimum site areas. This is more appropriately address by ECAN.		
<b>Stormwater:</b> As above, ECAN pathways are available for stormwater management. However, without an integrated system, cumulative effects on groundwater (and surface water in the case of stormwater) could begin to impact developments further down the line.		

### Timaru

Sub No.	Submitter (Further)	Address
Further Submission 272	G and J Travers	Via Pages Road, Timaru
Extension of FDA2 – Additional 26.6ha (General Residential – Priority – 5 years).		
No Infrastructure Assessment provided. Advised outside of scope for consideration.		

Sub No.	Submitter	Address
Submission 33	Ford et al	Via Pages Road, Timaru
Extension of FDA10 – Additional 21Ha (Rural Lifestyle – Priority – 5 years). Also seeking 2 years.		
No Response Required. No Three Waters evidence provided.		
<b>Recommendation is to reject the submission.</b>		

Sub No.	Submitter	Address
190	North Meadows	236 North Meadows Road
Rezone GIZ, 34Ha. Use FUZ for land Consented LU area and designation land.		
Anything can be engineered but they have not provided enough justification with Attachment B to support establishing a FUZ over the balance land mentioned above.		
<b>No change in recommendation to reject rezoning of Land outside of land covered by current Land Use consent.</b>		
No evidence has been supplied to confirm how the additional 19ha (excluding the WWTP designation land) will be serviced and whether the consented network extension will be able to facilitate wastewater disposal and water supply for the additional area.		

Sub No.	Submitter	Address
Submission 20	O'Neill	Connoor Road
GRZ (from GRUZ). 6.67Ha		
Identifying the subject sight as an FDA was originally proposed in the District Plan Review process, with its removal prior to the notification of the new plan.		
There is three waters infrastructure in the vicinity and upgrades to these systems are required for the existing environment. The required upgrades to are primarily in the sewer infrastructure.		
I have the following point on the evidence provided: <ul style="list-style-type: none"> <li>the design report supplied is an example which was lodged as part of the subdivision application for the extension of O'Neill Place, land currently zoned Res 1. Does not relate to the proposed FDA site.</li> </ul>		
From a three waters perspective, identifying the site as an FDA is a challenge because of the risk that the future development is not feasible, flood protection land required, stormwater management areas required, etc and the land taken up on the site to provide for the management of these matters.		
<b>Recommendation to reject rezoning to GRZ or establish GRZ FDA is retained.</b>		

Sub No.	Submitter	Address
227	Westgarth and Gibson	Pages Road (FDA1/FDA4)
Rezone FDA1 to General Residential, Realign FDA4 / FDA1 boundary, FDA4 should be priority rather than 10 years +.		
No further information supplied. <b>No change in recommendation.</b>		

Sub No.	Submitter	Address
30	McKnight	Brookfield Road, Timaru (Blue Rise)
Amending proposal narrowed – Rural Lifestyle for five additional lots, balance to be retained as GRUZ. <b>Relief narrowed to 2.66ha.</b>		
No further information supplied. Recommendation retained from original submission.		
<b><i>The rezoning to include the 5 allotments into the Brookfield Road Rural Lifestyle overlay is acceptable from a 3W perspective.</i></b>		

Sub No.	Submitter	Address
Submissions  Whitewater 248 / De Joux 157 (FDA13)  De Joux 157 (FDA14)	Whitewater, De Joux	FDA13 and FDA14
Unclear – Presumably rezone FDA13 GIZ now and FDA14 GRZ now.		
No further evidence has been supplied identifying a Development Area Plan or planning framework to support the immediate rezoning.		
<p>The evidence from Mr. Hole is correct that the \$13-15M high level cost estimates is for servicing FDA 13 and 14 and includes servicing to the middle of the sites.</p> <p>The cost estimate from the report referenced by Mr. Hole included:</p> <ul style="list-style-type: none"> <li>- A new wastewater main would be provided directly to the centre of each FDA area, with one pump station being provided for each FDA. The new wastewater main would be connected directly into the wastewater treatment facility in Washdyke. This needs further assessment.</li> <li>- Stormwater would be partially attenuated on new allotments, and that the downstream capacity of the stormwater system will not be sufficient to service future development. Potentially a new drain would be required to the coast.</li> <li>- That two new watermains would be required to service the sites (being extended from existing watermains in Washdyke).</li> <li>- The existing water supply mains would be upsized.</li> <li>- Consents and Approvals only make up 5% of the construction costs.</li> <li>- A contingency budget of 20% has been added given the high level nature of the estimated costs.</li> </ul> <p>Growth Capacity modelling previously completed by Council identifies that FDA 13 and 14 could be serviced through existing water and sewer networks (in terms of capacity), while the Washdyke industrial expansion zone growth triggers sewer network upgrades. However, extension of water and sewer networks (including associated infrastructure such as mains and pumping stations) would be required to efficiently and effectively service FDA 13 and 14.</p>		

The serviceability of the sites is based on several assumptions. Considerable detailed modelling would be required to address many of these assumptions to identify the how the areas would be serviced and the extent of downstream sewer network upgrades that would be triggered.

The lack of structure plan/DAP for the sites creates uncertainty in how they will be serviced. It is difficult to provide any more accurate costing than previously mentioned.

**I recommend that the proposed immediate rezoning of FDA 13 (GIZ) and FDA 14 (GRZ) be rejected.**

### Temuka

Sub No.	Submitter	Address
237	Aitken, Johnston and RSM Trust	26 and 52 Factory Road / FDA6
Rezone FDA6 to GRZ now, or as 5 years in SCHED 15		
No additional infrastructure information supplied.		
<b>FDA approach and scheduling in SCHED15 is to be maintained.</b>		