

**BEFORE THE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY
TIMARU DISTRICT COUNCIL**

UNDER the Resource Management Act 1991 (RMA)

IN THE MATTER In relation to the Proposed Timaru District Plan - Hearing
G (Growth Chapter)

**STATEMENT OF EVIDENCE OF SONIA REID DOLAN
ON BEHALF OF CLIENT AITKEN/RSM TRUST (SUBMITTER NO. 237)**

27th June 2025

Introduction, Qualifications and Experience

- 1 My name is Sonia Reid Dolan
- 2 I hold a degree in Resource and Environmental Planning from Massey University. I am a Full Member of the New Zealand Planning Institute.
- 3 I am a Principal Planner at Davis Ogilvie (Aoraki) Limited. I have approximately 20 years' experience in policy, strategic and professional resource management planning.
- 4 Prior to joining Davis Ogilvie (Aoraki) Limited I have been working primarily in strategic planning, policy planning and land use planning. Of relevance to the growth chapter, I have been involved in numerous planning projects involving the rezoning of land and residential land development when I was employed at Kainga Ora and doing population growth and demand capacity for new schools when I was employed at the Ministry of Education.
- 5 Although this evidence is prepared for a Council hearing, I have read the code of conduct for expert witnesses contained within the Environment Court Practice Note 2023 and agree to comply with it. Other than where I state that I am relying on the evidence of another person, I confirm that the issues addressed in my statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinion that I outline in this statement.

Scope of my Evidence

- 6 My evidence relates to the Aitken/RSM Trust submission on the PDP – Growth chapter. It addresses:
 - (a) the relief sought in the submission;
 - (b) the recommendations set out in the Section 42A Report.
- 7 In preparing my evidence I have reviewed:
 - the PDP;
 - the Section 42A Report for Hearing G: Growth of the PDP by Mr Matt Bonis.
 - the original submission on the PDP;

- the National Planning Standards;
- the National Policy Statement for Highly Productive Land (NPS-HPL); and
- National Policy Statement on Urban Development 2020 (“NPS-UD”)
- Any supporting evidence

The submissions

8 There were several points within the submission. In relation to this evidence the submission points relate to the following;

To rezone Future Development Area 6 (FDA6) in Temuka to General Residential Zone (GRZ) immediately;

Or

Amend the indicative development timeframe for FDA6 from 'beyond 10 years' to within the next 5 years.

Relief Sought

Within the scope of the submission, I propose the zoning change of a Future Urban zone (FUZ).

Post the Hearing process

As part of the package of the relief sought, I propose expert caucusing (post the hearings timeframe) to formalise and reach agreement as part of the District Plan review.

FURTHER INFORMATION PROVIDED TO TIMARU DISTRICT COUNCIL

- 9 Following the release of the preliminary S42a report, all submitters had to provide for the required information by 20 February 2025. This is attached in **Appendix A**.
- 10 The information was supplied to Council to address the planning framework, servicing considerations, environmental values and site-specific matters. Of relevance the matters included;
 - a) NPS: UD assessment
 - b) NPS: HPL assessment
 - c) An assessment in relation to the Canterbury Regional Policy Statement
 - d) Proposed Timaru District Plan
 - e) Servicing considerations to address infrastructure considerations to include Portable Water Supply, Wastewater, Stormwater, Electricity, and Telecommunications.
 - f) Hazard assessment – to include liquefaction and flood hazards.
 - g) Environmental values assessment

Section 42 report and deliberations

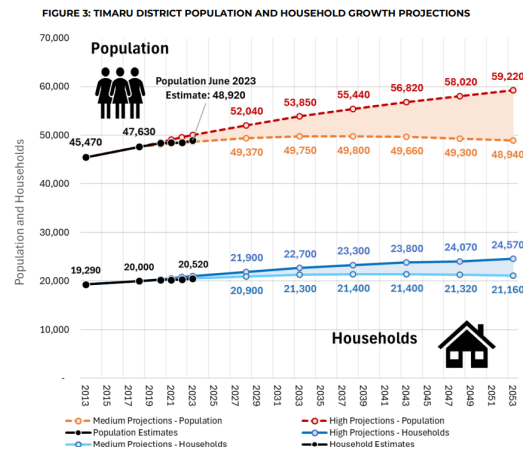
- 11 Mr Bonis sets out several matters within the Section 42A Report. They relate to satisfying the legislation and tests as set out under the various planning matters as set out under the NPS:UD and NPS:HPL. Other relevant matters include infrastructure provision, flood risk and transport.
- 12 Given the further information was supplied on the 20th February 2025 as set out in (3) and (4) above, within the s.42 report Mr Bonis asked for more evidence such as;
 - a) Infrastructure provision (including a geotechnical report)
 - b) Transport effects assessment
 - c) Flood risk assessment

- d) NPS: HPL report and;
- e) Outline Development Plan

These matters will be discussed in turn after the planning rebuttal as set out below.

Property Economics report and modelling

- 13 I note that Mr Bonis has been guided for any future residential zoning based on the Property Economics residential capacity report dated October 2024.
- 14 I disagree with Mr Bonis statement that the inclusion of rezoning for this site is not required for various reasons as set out below.
- 15 I note that the Property Economics report has not been peer reviewed or had a second pair of eyes to analyse the data. Based on best practice and in the interest of this modelling to quantify the metrics (for example predicting the dwelling capacity counts based on population growth) , it is unclear as to what method has been used to confirm this data. The report speaks to assumptions being made, based on the medium to high population projections that have been used based on the Stats NZ projections.
- 16 I note that Mr Bonis throughout his 42a report in assumptions for how growth should be measured, he refers to the medium growth scenario as set out in the Stats NZ modelling population predictions. I note this is a very conservative line to take and is not in line with the current population trend as outlined further down in my evidence. Going forward, for this evidence I will reference to the high growth scenario as this is a more realistic scenario and is consistently used by other central government agencies as a baseline for population predictions.



- 17 Based on the line graph above, it is assumed that the Timaru District would plateau in its population predictions within the period of 2021 to 2025.
- 18 I note that despite the plateau population predictions, the Timaru District population has had an uptick of growth. This is due to employment opportunities, affordable housing and an attractive lifestyle. The local economy is strong and the primary industries which has been in a growth mode for the past year and this continue to provide employment and opportunities for people to relocate to the District. Based on the Infometrics website¹ the Timaru population has exceeded the medium projections scenario and is in line with the high population modelling forecast. For example, in 2023 alone had a population increase of 1.9% (an increase of 900).

Timaru District			
Year	Level	% Change	Absolute change
2020	48100	0.6	300
2021	48200	0.2	100
2022	48200	0	0
2023	49100	1.9	900
2024	49500	0.8	400

- 19 Based on the high population scenario, I now turn to table 13 for dwelling capacity scenarios. Table 13 for its dwelling count predictions are based on the baseline yield of 450m² lot sizes across the District. Across the

¹ Source; Infometrics website June 2025

District the average residential typology size would be much larger than this. I quote the Colliers 2022 Residential Property Market Study commissioned by the Council noted on page 13; “Of note the average land area of a vacant section is 1033m² compared to 784m² for the average house”. Based on this, then the average yield lot size would be a more realistic **750m²-900m²**.

TABLE 13: DWELLING CAPACITY REQUIREMENTS – HIGH GROWTH

Location	Capacity Required	Urban Capacity	Sufficiency without FDA	Future Development Areas	Sufficiency With FDA
Timaru	3,047	2,582	-465	2,637	+ 2,172
Temuka	545	481	-64	312	+ 248
Pleasant Point	254	301	+ 47	79	+ 126
Geraldine	511	593	+ 82	428	+ 510
Total Urban	+ 4,358	+ 3,957	-401	+ 3,456	+ 3,055

- 20 Table 13 demonstrates that within the high growth scenario (in line with current population growth), then Temuka without the FDA allocation would not have sufficient land available (-64). Further, based on refined modelling with a realistic yield lot size of **700m²-900m²**, it is assumed that the dwelling deficiency would be in the vicinity of having a deficit of **-120 dwelling capacity**. This would also apply for the FDA areas, assuming the yield lot size of 450m² and thereby confirming that the yield may not be as high as it claims in the table.
- 21 As a Tier 3 Council, Timaru is not bound by the 15 HH/ha minimum that applies to Greater Christchurch under the CRPS. A 12 HH/ha net density assumption is both appropriate and consistent with established practice for similar-scale towns across the Canterbury region. The use of a 15 HH/ha or higher assumption in capacity modelling for Timaru overstates likely delivery potential and fails to reflect the character, market conditions, and infrastructure limitations of the district.
- 22 If Property Economics (PE) has removed 30% of gross area to arrive at net residential land, and then applied an average lot size of 450m², then their effective density is exactly 15 households per hectare (HH/ha). Whereas it is more realistic in the context of Timaru that average yield would be 12 HH/ha (i.e. 580m²) or 10 HH/ha (700m²) (as per CRPS Policy 6.3.12) where topography or site constraints are greater. This

difference being between 25% - 43% respectively. Therefore the amount of both available existing urban capacity and Future Development capacity would need to reflect this, potentially having a substantial effect on the capacity requirements.

- 23 From the table above the timing and sequencing of when the dwelling capacity has not been confirmed for the short, medium and long term. On that basis there is no guarantee for when land would be live zoned and thereby available for development purposes. On this basis it appears that there could be a shortfall of residential zoned land and I also speak for this in my statement below.
- 24 I note that the Property Economics report states *“If Timaru were to reach its long-term high growth projection of 24,570 households, the Council would need to ensure there is capacity for almost 5,000 dwellings over the long term. This means that the current realisable capacity is sufficient to supply 80% of the requisite capacity to the market, with **the potential** shortfall being covered by Council’s proposed growth areas”*. I note that this statement says that the Councils proposed growth areas has the **potential** to supply the shortfall. This also confirms that further evidence is required to ensure that there is sufficient residential land for the short, medium and long term. I recommend to the Hearing Panel that this be investigated further.
- 25 I note that the Property Economics report assumes a household number average of 2.75, and this would be factored in with the dwelling capacity predictions. I do note that Kainga Ora in their submission stated that the 117 households on the MSD’s waitlist for Timaru, approximately: *a) 50 per cent of demand is for a one-bedroom unit; b) 33 per cent of demand is for a two-bedroom unit; and c) 17 per cent of demand is for a three or four bedroom unit²*. Based on this, this would translate that the demand for housing based on a single or 2 person household, would mean that on average the 2.75 household number would be a lot smaller and therefore the dwelling count calculations could be misleading. I recommend to the Panel that this be investigated further.

² MSD data -September 2022

National Policy Statement: Urban Development and Government Temporary Powers

- 26 As set out under the NPS:UD 3.7 (c) (and inclusive of Tier 3 Councils) Councils must consider other options to overcome the insufficient development capacity. This would be either by (a) increasing development capacity or (b) enabling development. I note further that the government made a recent announcement on the 18th of June that it will use its powers temporarily to override Councils if they *“modify or remove provisions in local council plans if they negatively impact economic growth, development, or employment”*. I ask the Hearings Panel given there are many gaps and deficiencies within the Property Economics report as raised in my previous statements this would need to be revised to see if there sufficient development capacity in the short, medium or long term.

Recommendation of a planning tool to manage growth – Future Urban Areas to be in line with National Planning Standards

- 27 As far as providing future capacity across the District, I note the s32 analysis for the growth chapter *“has to consider reasonable options to justify the proposed plan provisions”*. On that premise the s.32 report noted that Planz *“recommends for the Proposed District Plan, a new Future Urban Zone to safeguard rural land for future urbanisation is provided and more intensive infill is provided in urban zones”*. Instead of a FUZ being adopted as a course for future zoning, Council then recommended Future Development Areas as a zoning pathway. The FDA are attached with timeframes which would mean that the FDA planning mechanism would not provide any guarantee as a standalone zoning pathway nor be receptive to the market demand should this shift quickly. I also note that the FDA is not endorsed by other Councils as a popular planning tool to address growth. Therefore it could be assumed that an alternative would need to be explored. Based on the above, I am of the view that that FDA is not the best planning mechanism going forward.
- 28 As stated in the original submission within the scope of seeking that the land be rezoned that I propose the zoning pathway of a Future Urban zone. The Future Urban zone is consistent with the National Planning Standards and also consistent with many Councils' who have endorsed this approach (including Tier 3 Councils such as Waitomo District Council).

The national planning standards defines the FUZ as follows;

Future Urban Zone Areas	Suitable for urbanisation in the future and for activities that are compatible with and do not compromise potential future urban use
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- 29 The Future Urban Zone can be subject to a structure plan that would also incorporate further technical investigations. I note like other Councils the infrastructure costings are dealt through the LTP process and/or privately funded with agreements in place between the developer and Council. An example is Porirua City Council which has allocated a future urban zone framework as part of the proposed District Plan. A variation to the Porirua District Plan to live zone FUZ, was subsequently endorsed 18 months post the future urban zone framework being in place.
- 30 I recommend that a Future Urban Zone be introduced with a view to the same with a variation to the District Plan once other stages of a structure plan/other infrastructure assessments are completed. The reasons why this would serve the district to manage growth is as follows;
- a) This is not time-bound much like the current FDA process (5 to 10 years plus) and rather these changes can be receptive to the market and driven by pent up demand in a much shorter space of time.
 - b) The FUZ will also ensure that the Council is consistent with the National Planning Standards, be consistent with the directive of other Councils.
 - c) The changes will be receptive to what the current government is pushing for to ensure that an introduced planning framework is robust and will not *“hinder economic growth, development, or employment”* and;
 - d) As endorsed by many Councils I therefore recommend the FUZ as a way forward to manage the growth for the Timaru District.
- 31 I will now speak to all other matters to include;
- a) Infrastructure provision
 - b) Geotechnical report including preliminary Natural Hazard Assessment (flooding)

- c) Outline Development Plan
- d) Transport assessment
- e) NPS: HPL report

Infrastructure provision

- 32 I note that in respect to infrastructure matters, that Mr Bonis rejects the request to rezone being based on objective 6 of the growth chapter PTDP and having no funding allocation within the LTP.
- 33 Objective 6 of the PDP states that *“decisions on urban development that affect urban environments requires integration with infrastructure planning and funding decisions and be strategic over the medium and long term”*.
- 34 In respect to objective 6 above, I note that coordination between the Council and providing for the infrastructure planning and funding decision could be addressed through the planning mechanism of a structure plan to enable the provision of infrastructure. Other Councils have used the same approach with a proposed future urban area zone, with a structure plan being developed within the medium to long term to ensure that development can enable the provision of infrastructure such as roads, water, wastewater and water supply.
- 35 I note that the TDC Growth Management Strategy states under C:2.1 – Benefits of the GMS;
- “Targeted infrastructure costs. Servicing land use growth affects Council expenditure, which affects rates. A strategic, integrated and proactive approach to the provision of new land areas to meet demand in homes, shops and industry, with infrastructure provided proactively as and when needed means increased certainty. Both in terms of the wider community, and of the costs borne by the development community through their contributions to infrastructure provision. The Council’s expenditure is then focused towards where actual growth will occur, resulting in efficient and prudent Council infrastructure investment”*.

- 36 In summary of the above from the GMS is implicit that servicing land use growth will occur. Along with the provision of the infrastructure, the client accepts that the infrastructure upgrade costs may need to be paid at their cost. However, for any upgrade that occurs that may result for overall public benefit then accordingly these costs should be shared between Council and the developer. As far as the reference to the Long Term Plan, the allocation for the LTP is one that can be done iteratively every 3 years, and once the structure plan has been approved, the funding mechanism can be allocated within the LTP accordingly.
- 37 Further to the statement above, Selwyn Chang, a qualified Civil Engineer has provided an engineering statement of evidence as attached in **Appendix B** He will now speak on the clients behalf.

Integration of Supporting Technical Evidence (Appendices B–E)

- 38 The following section summarises the relevant expert evidence appended in support of this submission and addresses matters raised by the Section 42A author and Council's specialist advisors.

Appendix B: Evidence of Selwyn Chang – Civil Engineering and Site Constraints

- 39 Mr Selwyn Chang (CPEng) provides a professional civil engineering assessment focused on the 3-Waters infrastructure feasibility for the proposed rezoning at FDA6 (Factory Road). His evidence confirms:
- **Stormwater** will be managed on-site via a low-lying area identified for a large stormwater management area, integrated with naturalised reserves and riparian corridors.
 - **Water supply and wastewater** connections are technically feasible and can be integrated into existing council infrastructure, with upgrades staged alongside development.
 - In addition, Mr Chang responds to third-party matters:
 - **Geotech:** No known geotechnical constraints inhibit development. Noting that, the Geotechnical Desktop Study assessment (by Davis Ogilvie and Partners – Christchurch) references and comments specifically on ECans flood hazard

assessment which was previously supplied with the RFI to the preliminary s42A report.

- **ECan's Listed Land Use Register:** No identified HAIL sites that would constrain development.

40 This directly responds to and rebuts the implication by Mr Bonis that the site may be prematurely rezoned without development certainty.

Appendix C: Outline Development Plan (ODP)

39 Mr Bonis has raised that the lack of DAP cannot inform such a plan change. The enclosed outline development plan can be used to inform the structure plan process and all other relevant matters to include for the intended subdivision, use and development.

The ODP submitted shows:

- A clear and logical road hierarchy and movement network.
- Pedestrian and cycle connectivity.
- A large stormwater area co-located with riparian corridors and open space providing both infrastructure and visual containment at the site's north-eastern edge.
- This responds directly to Council concerns regarding interface management and urban containment, demonstrating that sprawl will be avoided and a masterplanned approach will be applied.

Appendix D: Transport Memo – Antoni Facey (Avanzar)

41 Mr Facey concludes that the existing road network, including Factory Road and Seddon Street, can accommodate the expected residential traffic volumes, subject to localised intersection upgrades.

- He confirms that **connectivity and permeability** have been considered in the ODP.
- No fatal flaws exist in regard to traffic capacity, safety or access.

42 This addresses Mr Bonis' and Council's concerns regarding traffic impact and confirms a transport-led planning response.

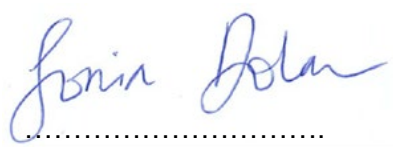
Appendix E: NPS-HPL Assessment – AgriBusiness Group

- 43 A full Clause 3.6(1)(c) assessment of the National Policy Statement on Highly Productive Land (NPS-HPL) has been undertaken by the AgriBusiness Group. The assessment concludes that:
- While the site includes LUC2 land, **soil limitations, poor drainage, cold winters, and lack of irrigation access** materially constrain its productive value.
 - **Economic analysis** indicates that the long-term benefits of residential development far outweigh the marginal economic return from primary production.
 - Environmental, social, and cultural benefits of the development include reduced nitrate loss, carbon sequestration, biodiversity enhancement, and improved housing supply.
- 44 This directly addresses and satisfies the policy test under Clause 3.6(1)(c), which Mr Bonis considered to be insufficiently justified at the time of writing the Section 42A report.

Overall conclusion

- 45 I consider that the matters raised by Mr Bonis have been addressed
- 46 I recommend that the Property Economics report be peer reviewed, the data be reanalysed to ensure that there is sufficient residential capacity for the short, medium and long term.
- 47 As was originally recommended in the s.32 report for a new growth framework for the PTDP, I recommend that the FDA be replaced with a different planning framework of the Future Urban Zone (FUZ). The FUZ will also ensure that the Council is consistent with the National Planning Standards.
- 48 I recommend that a Future Urban Zone be introduced with a view to the same with a variation to the District Plan once other stages of a structure plan/other infrastructure assessments are completed.

- 49 Finally, Mr Bonis raised the statutory framework points *“the rezoning would not promote a ‘coordinated pattern of development’ to give effect to CRPS Policy 5.3.1 and would not better achieve ‘a consolidated and integrated settlement pattern’ as sought by UFD-O1”*. Having addressed the points as per above in the evidence, and attaching the various supplementary expert reports and evidence, I am of the view that the rezoning *“would achieve the coordinated pattern of development and give effect to CRPS Policy 5.3.1”* and would achieve *‘a consolidated and integrated settlement pattern’ as sought by UFD-O1”*.

A handwritten signature in blue ink, appearing to read "Sonia Dolan", is written over a dotted line. The signature is fluid and cursive.

Sonia Dolan

Date 27th June 2025