APPENDIX A

Response to Preliminary s42A

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MEMORANDUM REPORT: PTDP – Hearing G – Response to RFI

To:	Timaru District Council
Applicant:	Submitter 231 - Blackler
From:	Davis Ogilvie (Aoraki) Ltd and Avanzar Consulting Ltd -
Date:	20 February 2025
Subject:	Response to Hearing G Preliminary s42A report

1 INTRODUCTION

This memo has been prepared in response to the preliminary s42A report prepared by Mr Matt Bonis and issued in October 2024, and subsequent clarification provided by Council and its representatives in the months since.

In his preliminary report, Mr Bonis identifies the purpose and scope of his report, and acknowledges the need described by Panel Minute 6, for more time for assessment and reporting than usual. In his preliminary report, Mr Bonis provided a checklist (Appendix 1) of the information required and for our client, Blackler, among others, identified additional information as also being required.

In addition to the general requirements, the following additional information was sought:

a) *The existing environment, including configuration and fragmentation of titles and geophysical boundaries that would delineate the requested zone boundaries.*
b) *The exact spatial extent of the rezoning sought and anticipated yield*
c) *Application of the requirements of the NPS-HPL*
d) *Application of requirements in the NPS-UD especially in terms of development capacity beyond 'at least sufficient development capacity' for the purpose of Policy 2, and implications for integrated infrastructure and funding decisions (Objective 6).*
e) *Consideration against the relevant statutory framework for achieving a consolidated pattern of development (as required by the CRPS and notified PDP) for all submissions listed, which includes the provision of a 'coordinated pattern of development' including implications for amending timeframes associated with SCHED-15*
f) *Service provision as set out in Attachment B.*

2 BACKGROUND

Our client's submission seeks that 10 Burke Street (Figure 1) is rezoned to a combination of General Rural (or OSZ) and General Residential Zone (GRZ) in accordance with a conceptual layout showing aged residential care and gardens. The current relevant overlays are also included in Figure 1.

Description	Overlay
Entire site	DWPA – for Community Drinking Water Supply
	Esplanade Provision: Pleasant Point Stream
	Versatile Soils
Entire site	Flood Assessment Area
Entire site	Liquefaction Area
	Public Access Provision
	Wai Taoka Lines: SASM-16 Opihi River and tributaries

Figure 1: The subject site as shown in the Proposed Plan showing relevant planning overlays.

Our client has considered the proposed future design for development of the site in more detail, since their submission was first submitted to Council at notification stage. An updated concept plan for the site is attached as Appendix 2 and shown in Figure 2 below.

The concept plan shows a development that comprises a range of retirement units and aged care facilities in the southern portion of the site, with no residential buildings proposed to be located to the north of the stream that intersects the site. The applicant is currently preparing a resource consent application for this style of residential development on the site.

Figure 2: Concept Plan

Our client seeks rezoning of the site to allow for this form of development. Our client would be open to the consideration of a partial 'site specific' zoning format, an outline development plan approach or other appropriate approach, should greater control be required beyond a standard change of zone approach, particularly regarding site layout and approximate building locations.

The subject site is located within the township of Pleasant Point, a growing community of 1428 as recorded by the most recent 2023 census. The town has two Primary Schools, with approximately 340 pupils.

Figure 3 below, from the Timaru Proposed District Plan planning map, clearly shows that the subject site (10 Burke Street) is sandwiched between two existing residentially zoned land holdings. The site extends to the north, with a portion of the subject site located to the north of the stream shown on the planning map, however the submitter does not propose any residential development beyond the stream. It is worth pointing out at this juncture, that the residential zone boundary in the vicinity of the site, follows the path of the waterway that extends through the site from west to east.

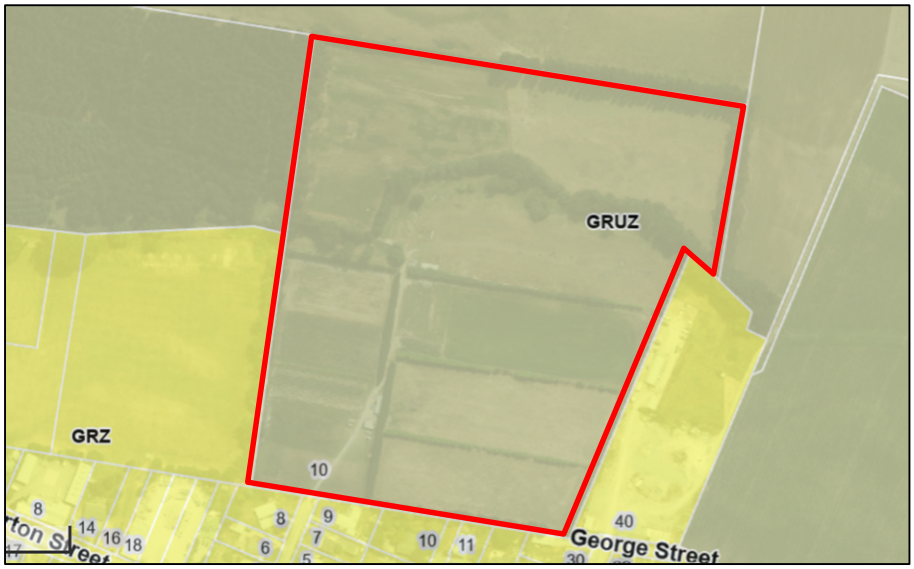


Figure 3: Subject site indicated in red (Source: Proposed Timaru District Plan)

The site is located on the northeastern side of the township, with land on both the east and west already zoned for residential purposes as seen in the planning map above. Consent for residential development is in Council for the establishment of 27 dwellings at 16 Horton Street, directly adjacent to the western boundary of the site. Pleasant Point is characterised by predominantly single family dwellings on residential sites that comfortably have space for mature landscaping and an open space urban character.

3 RESPONSE

This memo provides a brief response to the relevant questions posed in the preliminary s42A report. Distinctly separate responses are not provided to each question posed in the checklist and supplementary questions, to avoid repetition.

NPS-UD

***Question 1**: What is the contribution of the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) in terms of the provision (residential / rural lifestyle – yield, density; and business - area) in relation to the Council's provision of 'at least' sufficient development capacity (**Policy 2**) given the Property Economics analysis (**Section 8**)?*

The submitter seeks to establish an aged care and retirement village facility at the site. While the underlying zoning is Rural 1 and Rural 2, the submitter has requested to change the proposed General Rural Zone to General Residential Zone through this plan review process, in order to accommodate the development of their proposal on the site. As discussed above, some form of hybrid zone, or use of outline development plan or partially site specific rules may be appropriate.

The Timaru District Council appears to have relied heavily on the Property Economics Report to justify the extent of rezoning required through this plan change process. It is our opinion that this reliance is flawed, and

that a wider assessment of both existing capacity, and how that capacity might meet the needs of the population is required.

The 'Property Economics' report examines the development capacity of existing and identified land for future general residential development within the district. In doing this, it has considered existing site sizes, proposed densities, and applied a series of parameters to allow them to draw conclusions to allow for sufficient development capacity in the district for the prescribed timeframes. In regards to NPS-UD please also refer to the attached brief planning advice memo prepared by Novo Group, attached as **Appendix 5.** In addition to the Novo Group memo matters considered particularly relevant to this site are discussed below.

The submitter in this case, seeks to rezone the site to allow for a specific style of residential development, which is aimed to address the current failure of the district to provide suitable accommodation to allow the elderly to 'age in place' within their own communities. The submitter is aware of growing community need for retirement options in rural communities, and recognises that not all residents would wish to move to the larger centres of Timaru and Geraldine as they age.

The Property Economics report does not address the needs of the elderly in particular. In New Zealand, there is an increasing recognition that it is important for the aged population to have the opportunity to age in place. This can include elderly being able to remain in their own homes with additional services available or being able to move into custom built homes or communities with care on site.

In recent years, the New Zealand Government produced a strategy entitled 'The Better Later Life – He Oranga Kaumātua 2019 – 2034'. It recognises the particular issues that older people face in accessing suitable housing and seeks to address these issues. The Council must consider these issues and apply them when considering sufficient development capacity. This is because having sufficient development capacity is completely unhelpful if it is not located in places where people want to live, and doesn't provide the level of amenity that people want to live in. If locations and typologies don't inspire the community, then they won't be taken up as actual development, and house prices inevitably increase through a lack of housing choice.

It is important to recognise that senior citizens remain valuable members of their communities as they age, many with deep personal connections to the immediate communities in which they live. Senior citizens are often highly involved in community activities and take on responsibilities that other younger generations do not necessarily have time for, particularly within community activities such as sports, clubs and groups. They add economic value to communities by spending their money locally, and their community involvement is a real asset to the wider community. Given this, it is imperative to ensure that opportunities for ageing in place are provided in small rural communities. If this provision is not made, the lack of opportunity results in loss of population, as older people are forced to leave their communities. Loss of population has a detrimental effect on the social fabric of a small rural community, and also has a significant economic impact on local businesses and services.

Despite this clear and acknowledged need, the Property Economics assessment takes an approach that does not focus on the needs of the community. Instead, it focuses on residential development area or space (size of residential dwelling based on typology) as its main determinant of capacity. This focus is therefore predominantly on the physical capacity of development potential for an area. This approach allows for a technically accurate quantification of available 'space', but does not address the needs of the community, and

because of this, does not reflect the 'actual' level of development capacity that is available. Furthermore, taking this approach in isolation, and the failure of the relevant reports to consider and investigate the actual social demand and requirement for different styles of residential development, and indeed where that development capacity should be located, is a significant flaw in the assessment, and must be addressed in a substantive way, rather than paying lip service to the issue.

In essence, what the Council's reliance on empirical data does not address, are the aspirations, wants and needs of the community. The empirical data approach does not address each individual rural township or each community's aspirations for all members of their community, and the approach appears to contain some flaws that have the potential to skew the outcomes.

In conclusion, while the analysis supplied by the Council considers some of the appropriate factors in quantifying 'sufficient development capacity, it overlooks the provision of sufficient development capacity to cater to the needs of this demographic (and others). Rezoning of this site would provide for the needs of aged residential development in the Pleasant Point community and would assist in the retention of population, have significant social and cultural benefits for the community, and would provide sufficient capacity for the older population of the immediate area, to enable them to age in place.

Question 2: *For residential and business rezonings how would the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) contribute to 'well-functioning urban environments' (**Objective 1** and **Policy 1**) and align with responsibilities of the Timaru District Council to ensure decisions on urban development that affect urban environments are integrated with infrastructure planning and funding decisions (**Objective 6**)?*

The proposed residential rezoning of the subject site for the purposes of retirement housing will contribute to a well-functioning urban environment by:

- Enabling the provision of dedicated residential care services for the aged within an area where this is currently unavailable;
- Providing residential development within an existing residential neighbourhood, resulting in the development resembling a density relatively similar to that of the existing surrounding urban area, with high levels of amenity, open space and landscaped areas;
- Providing Pleasant Point residents with an option to have supported ageing facilities within their local community.
- By continuing residential development so that it aligns to the boundary enjoyed by the blocks either side of the subject site – that is the stream that passes west – east through the site.
- The rezoning would allow for connectivity with the surrounding residential neighbourhoods.

The proposed rezoning will align with the responsibilities of the Timaru District Council to ensure future urban development that is integrated with infrastructure planning. The attached infrastructure servicing assessment prepared by Davis Ogilvie confirms that servicing can be achieved for the site in a cost-effective manner, and that engineering solutions are available to mitigate against any issues.

NPS-HPL

Question 3: Urban Rezonings: *Demonstrate consideration and alignment with the requirements of the NPS-HPL* ***Clause 3.6.*** *for any submission for an urban rezoning (****GRZ*** *or* ***GIZ****) where the exemptions in 3.5(7)(b) are not applicable.*

The applicant has obtained assessment from the experts on highly productive land at 'The Agribusiness Group' and their assessment is attached in Appendix 3 to this memo.

Clause 3.6 of the NPS-HPL requires that:

(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.

Notably, clause 4(c) requires that *'the environmental, social, cultural and economic benefits of rezoning outweigh the long term 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.'*

The 'National Policy Statement for Highly Productive Land - Guide to Implementation' (Ministry for the Environment, 2023), expands on the requirements of the assessment defined in clause 4(c). The guide also defines the meaning of intangible values as including:

- *Its value to future generations*
- *Its future characteristics and limited supply*
- *Its ability to support community resilience*
- *The limited ability of other land to produce certain products*

As noted by the Agribusiness Group, the site contains soils classified as Category 2 (2ha) and Category 3 (9ha) productive land (see Figure 4 below).

Figure 4: Extract from The Agribusiness Group report showing the LUC Class of the site, showing the dark green, southwestern portion of the site classified as LUC Class: 2, and the remainder of the site shown in light green classified as LUC Class: 3.

The applicant proposes, as discussed above, to develop the site in accordance with the proposed development concept below.

The Agribusiness Group, in their assessment, quantifies the costs of utilising the productive land, and considers the potential financial output from an appropriate agricultural use. The Agribusiness Group note that efficient use of the land is constrained by its size and consider that the site would be more useful to a farmer as part of a larger farming entity. Furthermore, they note that even that use is limited in its potential, given its size and the consequent cost involved in productively farming the land.

In carrying out their assessment of the proposal, Agribusiness Group consider and discuss the benefits of the proposed zoning and the cost of the loss of highly productive land. It is worth noting that while the NPS-HPL provides for a fairly stringent 'avoid' approach for rural lifestyle zoning on highly productive land, it allows for a more enabling 'restrict' approach to urban rezoning situations. This is due to the recognised need for highly productive land to be used in some circumstances to provide sufficient development capacity for housing (and business land) while also ensuring assessment of the alternatives. This concept is particularly applicable for the subject site's situation.

This aspect of the NPS HPL also recognises the fact that urban rezoning typically has significantly greater benefits than rural lifestyle zoning in terms of efficient land use, as it allows for more intensive development and therefore uses less land per housing unit.

As noted by Mr. Bonis in his s42A preliminary report, an assessment of the pathway tests in Clause 3.6 of the NPS-HPL is therefore required.

Clause 3.6 of the NPS-HPL enables a territorial authority to provide for sufficient development capacity to meet demand for housing, and then to consider other matters. The NPS-HPL contains differing requirements for the various 'tiers' of territorial authority. Within the Timaru District, being a tier 3 territorial authority, a pathway for rezoning is found under Clause 3.6(4).

Clause 3.6(4) allows rezoning of highly productive land where:

- *It is required to provide sufficient capacity to meet demand for housing and business land.*
- *There are no other reasonably practicable and feasible options for providing the required development capacity.*
- *A robust assessment of benefits and costs is undertaken that demonstrates the benefits of the rezoning outweigh the costs associated with the loss of HPL.*

In terms of this submission, and in addition to the responses already included above, relating to sufficient capacity, given the site's unique situation within Pleasant Point, and in addition to The Agribusiness Group's assessment, it is worth considering the costs and benefits anticipated in more detail.

Environmental costs and benefits

The environmental benefits of the proposed rezoning are wide and varied. At present, the land is rural and is planted in pasture, with an unfenced stream extending through the site in a west-east direction.

As part of the rezoning request, the applicant intends to establish a rest home / retirement village / aged living development, complete with high quality landscaping. The development will include provision for the improvement of the waterway margins, with care taken to ensure that weeds are managed and planting will occur along riparian margins in such a way that native and introduced fauna will reestablish and thrive. Furthermore, landscaping of the site in conjunction with urban use of the site will allow for additional movement of land fauna across the site, (effectively an urban ecological corridor), instead of remaining an open field 'monoculture', in which both land and air based fauna are less likely to cross.

This habitat development that will result from the proposed urban rezoning and eventual development represents a significant environmental benefit. The rezoning will also have positive environmental effects on neighbouring properties. With the exception of construction periods, the removal of farming practices that may create noise, dust and disturbance for immediate residential neighbours will assist in ensuring a future urban environment with high amenity for inhabitants of the area.

Economic costs and benefits

This matter has been assessed within the Agribusiness Group's report and is more appropriately addressed within that report. However, the economic effects of the change of use from rural to residential is wide reaching. The retention of senior citizens within the township, and the retention of their economic inputs into the township businesses is positive, as is the potential for family homes once inhabited by local older persons becoming available as housing for younger generations in the township. The Agribusiness Group does acknowledge that a cost in loss of employment in the agricultural sector is possible – and have quantified this

as representing 0.04 FTE's. They have also quantified loss of income over the required 30 year assessment period, and considered the slight reduction in agricultural outputs if the land is lost to agricultural use. In conclusion though, and considering all the economic costs and benefits, it is clear that the benefits of the rezoning outweighs the costs.

Social and cultural costs and benefits

The proposed rezoning would, as discussed above, result in significant social benefits, for a range of parts of the community. Senior citizens would benefit from the opportunity to age within their own community, the younger generations benefit from the provision of housing for seniors, through their ability to continue to be active in the community, and for their patronage of local businesses.

In conclusion, and with regard to clause 3.6(5), it is considered that the proposed rezoning of the subject site meets the requirements of clause 3.6. In our view, it is important to consider that 'sufficient development capacity is not merely an empirical assessment. Instead, a wider view should be taken, and the needs and views of all facets of a community should be considered. If the Council fails to consider the needs of all members of a community in determining capacity, there is a real risk that housing typology, location and style will not attract existing residents to stay, nor encourage new residents to settle in the District.

Question 4: Rural Lifestyle Rezonings: *Demonstrate consideration and alignment with the requirements of the NPS-HPL* ***Clauses 3.7*** *and* ***3.10*** *for any submission that requests a Rural Lifestyle rezoning (****RLZ****) where the exemptions in Clause 3.5(7)(b) are not applicable.*

Not applicable

Canterbury Regional Policy Statement

Question 5: Growth Rezonings / Amendments to SCHED-15*: Does the proposal, either individually or in combination with those areas identified in the PDP concentrate and promote a coordinated pattern of development (referencing capacity provided in* ***Section 8*** *of this report).*

The zoning of the subject site will provide a sensible addition to the existing residential development within the northern Pleasant Point area. The proposed development of the site for coordinated and comprehensive residential purposes will allow for concentrated residential development that is similar to that of the surrounding residential area, while also being sympathetic to the rural land uses north of the site.

Ensuring sufficient capacity of retirement living and aged care facilities to support the increasing ageing population does not appear to be considered within the Property Economic Report. Rezoning the site to residential land use will allow appropriately located development to occur, designed for a specific aged demographic within the district. The proposed rezoning will promote a coordinated pattern of development, which remains concentrated in Pleasant Point, and in essence, given the site's location with zoned residential land on three of its four sides, the addition will represent a sensible and pragmatic extension of the zone boundary.

Question 6: Energy efficiency: *Does the proposal assist in maintaining an urban form that shortens trip distances.*

Currently the subject site is used for rural purposes and its irregular shape causes an indent in the boundary of urban form. The residential development within the subject site would allow for the logical use of existing roading networks, will not lengthen existing vehicle trips within Pleasant Point.

Providing for aged residential development locally will reduce the amount of vehicle movements to Timaru or Temuka, where the nearest aged residential care facilities are located, and enable all members of the community to age in place should they wish.

Question 7: Natural Hazards: *Is the subject site associated with the submission free from inappropriate risk from a natural hazard event, if not what is the appropriate management response – including avoidance.*

The subject site has the potential to be subject to flood risk given the subject site is traversed by the Pleasant Point Stream. Flood hazard advice had been obtained from Environment Canterbury (and is included in the Engineering Servicing Memorandum included as Appendix 4). This advice indicates that the northern section of the site is prone to flooding in 1 in 500 year events.

This flood assessment has informed the development design of the proposed aged residential development, where buildings are proposed will be located towards the southern end of the site, and will have fixed floor levels exceeding what is required. Locating development at this end of the site will also secure ingress and egress from the site, in the event of a flood.

Given the proposed location of proposed development on the site, and mitigation measured proposed, the development of the site for residential purposes is not considered inappropriate.

Proposed District Plan

Question 8: Proposed District Plan: *Does the urban growth / rural lifestyle development (and or sequencing) contribute to a consolidated and integrated settlement pattern, achieve a coordinated pattern of development and is capable of integrating with the efficient use of infrastructure?*

The rezoning of the subject site for residential purposes (aged residential living), will provide for a consolidated and coordinated urban form. The subject site is currently used for passive rural purposes on the direct fringe of the Pleasant Point township. This rural land causes a gap in the urban form. The density of development proposed is not dissimilar to traditional residential development, therefore, residential development in this area is not considered inappropriate, or out of character for the surrounding area.

Given the location directly adjacent to an established residential area on 3 of 4 sides, connection to potable and wastewater infrastructure will not be complicated. The proposal will also integrate efficiently with the existing road network. The Engineering Servicing Memorandum (Appendix 4), prepared by DO, covers matters of infrastructure servicing in more detail. In terms of coordination of development within the wider township, it is considered that the early development of the subject site is logical, and will not preclude other development.

Question 9: Growth Rezonings / Amendments to SCHED-15: *Given the updated residential capacity projections in* ***Attachment A****, how does the proposal, either individually or in combination with those areas*

identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure 'sufficient development capacity'?

The proposed rezoning of the site from rural to residential development will provide for a coordinated when considered within the wider District. The development capacity or social requirement for this type of residential development for elderly people has not been provided for within the growth projections of Attachment A to the s42A preliminary report. The site area required to develop a facility of this kind, could be considered greenfield development, however, the maximum density of this site would not be achieved (as assumed for greenfield development in Attachment A) due to:

- Exclusion of development from the northern portion of the site
- Allotments would not be subdivided once units were established on the site
- Development focus on a more low density retirement development, with elements of rural life mirrored in the design (green and open space priorities)

Inclusion of the subject site within the residential zone will allow for sufficient development capacity for aged residents/aged care facility to be realised at a local level. Central government policy guidance has repeatedly reiterated the need for both genuine housing choice, and the provision of opportunity for ageing in place as key issues that face New Zealand. The Timaru District Council must seek to actively address community needs by providing genuine choice when considering 'sufficient development capacity' rather than repeating past failures in policy, by not allowing provision for different forms of living in all communities. A solely quantitative assessment of capacity will not achieve the actual level of capacity required to give housing choice to communities. It is therefore considered that the proposed rezoning is required to meet sufficient development capacity.

Question 10: Growth Rezonings / Amendments to SCHED-15: *Given the Industrial land capacity projections, how does the proposal, either individually or in combination with those areas identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure 'sufficient development capacity'?*

Not applicable

Infrastructure and integration with land use

Question 11: Service Provision: *Identify (in conjunction with the requirements of* ***Attachment B****) how the future servicing needs of the area and the provision of adequate, coordinated and integrated infrastructure to serve those needs, including how using water sensitive design to manage stormwater will be undertaken.*

The site will be able to connect to the existing Pleasant Point Urban Drinking Water Supply Scheme. The Engineering Servicing Memorandum (Appendix 4), prepared by DO, covers this in more detail. On-site storage tanks may be included in the design to further support the supply. The site is located northeast of the township, and is connected to the township by Burke Street, Frederick Street, and George Street (subject to approval). Residential sites along these streets are currently connected to the reticulated water network, therefore, physically connecting to the network is considered simple. It is noted, however, that capacity within the system would require confirmation once final site design has been determined. Wetland areas and

planting of riparian margins will utilise water sensitive design features to manage stormwater quantity and quality.

Where consent is identified as required from Environment Canterbury and the Land and Water Regional Plan, this will be obtained prior to development on the site.

Question 12: Infrastructure integration: *Identify whether the rezoning if not required for 'sufficient development capacity' would result in wider issues for the district in terms of integration with infrastructure planning and funding decisions, or where for Rural Lifestyle Rezoning has consequences for overall yield / density and servicing requirements.*

The site is not identified as a future development area, however, is not considered to have wider issues for the District in terms of integration with infrastructure planning or funding decisions. Development of the site for residential purposes represents a sensible option, as the land is already adjacent to existing established infrastructure. The location of the proposed residential development is appropriate, and the site can successfully be integration with the existing infrastructure systems.

Question 13: Hazards: *Demonstrate with reference to suitable standards, the avoidance and / or management of inappropriate natural hazard risk, and suitable geotechnical conditions.*

As discussed in Question 7 above, the proposed site is subject to flood hazard overlays. An Engineering Servicing Memorandum (Appendix 4) has been provided which addresses flooding and a flood assessment.

Furthermore, an initial geotechnical analysis by Davis Ogilvie & Partners has been undertaken on the site, including site testing. This geotechnical assessment concludes that the site is appropriate for development from a geotechnical perspective. The report can be made available on request, however from the executive summary it is concluded that:

The most significant natural hazard affecting the site is from flooding associated with upstream breakouts from the Te Ana A Wai River. Environment Canterbury (ECan) has carried out a flood hazard assessment for the site and provided areas suitable for development (where flooding in the order of 300 – 550 mm is expected) and areas unsuitable for development ("high hazard flood"). To meet flood management Finished Floor Level (FFL) requirements, site-wide engineered filling will need to be carried out. The implication of filling may result in floodwater displacement; therefore, this will require careful consideration for the development of the final scheme plan and availability of land to be used for stormwater attenuation.

It is considered that the lower risks from other natural hazards can be sufficiently managed through appropriate infrastructure and structural design, provided the recommendations provided in this report are followed. It is therefore considered that the site is suitable for the proposed rezoning and residential development, subject to the following geotechnical conditions:

- *Site-specific geotechnical investigations are carried out at building consent stage.*
- *FFLs are confirmed during the consenting process by Timaru District Council (TDC) and / or ECan.*

Transport

Question 14: Transport network integration: *Demonstrate with reference to suitable standards and the potential yield / density of development – the safe and efficient functioning of the supporting transport network, ability to facilitate modal choice, and consolidating an accessible urban form.*

The Engineering Servicing Memorandum addresses anticipated traffic generation and the ability of the surrounding network to accommodate the land use. It is considered that the site can be developed in accordance with the best practice traffic design and safety principles and will have no detrimental effects on the existing traffic environment.

Environmental values

Question 15: Existing Environment and characteristics: *Identify the following as relevant to the submission:*
(a) The existing lawfully established land use(s) as they relate to the area that is subject to the submission, including: density (and existing fragmentation of sites), amenity and character, and range of uses.
(b) Geophysical boundaries that would distinguish zone boundaries, including how the proposal would result in the contiguity of existing urban areas (proximity and agglomeration of existing urban areas).
(c) Existing resource consents that provide for established land uses, including alignment with the anticipated outcomes associated with the submission.

The subject site is currently used for traditional rural activities (pasture). The site is comprised of regular shaped oblong paddocks, fenced by shelter belts. The site is visually rural and open in nature. There are some rural farm sheds and storage established on site.

The proposed rezoning will align residential use with the boundary of the Pleasant Point Stream, with the southern portion of the site sought to be rezoned General Residential and the northern portion of the site (separated by the stream) remaining more rural in character. The stream provides a clear and distinct geophysical boundary for the proposal and represents a sensitive limit for the residential use which would ensure that the urban form is linear and logical and configures with adjoining land to the west and east. Indeed, the proposed planning map, included earlier in this memo, shows clearly the current incongruous zone boundary, which would be rectified if this proposed rezoning proceeds.

No prior land use would preclude or influence the proposed rezoning and change in land use.

Question 16: Environmental Values: *Where the site incorporates or adjoins any of the following as notated within the PDP:*
(a) Specific values associated with Landscape values and natural character.
(b) Biodiversity constraints.
(c) Cultural and / or Heritage values.
(d) Existing or permitted Intensive Farming Activities, Rural Industry or other established Rural that could generate incompatible land uses with the submission outcome.

The subject site is not located within an area of natural significance, biodiversity overlay, or is identified for cultural of built heritage.

The subject site is intersected by the Pleasant Point Stream, which is subject to esplanade and public access provisions. There are no biodiversity, landscape, cultural, or heritage values that constrain the site, nor are there any incompatible use matters that would arise as a result of the rezoning.

Submitters shall provide information as to whether any additional standards, rules or methods (other than those already contained within the respective zone standards) are required to maintain or enhance any specific attribute, value or effects. This shall include where specific features or attributes should be retained through subsequent subdivision, use or development.

No specific additional standards, rules, or methods have been considered as part of this additional memo, however, it is acknowledged that it may be appropriate to generate site specific rules and methods such as the provision of an outline development plan to ensure that future development proceeds in a prescribed manner, providing certainty for both Council and the community.

Specific matters

Question 17: Submitters shall provide information and analysis on the specific matters identified, noting that these may well overlap with Questions 1 – 16 above.

All of the relevant specific matters and information requirements have been included in earlier sections of this report memo.

4 CONCLUSION

Overall, the Submitter proposed to rezone the southern portion of the site, south of the Pleasant point stream, from Rural to General Residential under the Proposed Timaru District Plan. The site is located within an established residential area, with deemed adequate access to infrastructure connections. Additional information has been provided regarding the NPS-HPL, as well as Engineering support with regard to natural hazards, transport, and infrastructure. The submitter intends to establish an aged residential care facility within the residential zone, to provide an alternative residential option for a specific demographic within the district.

Disclaimer: The above is intended to provide the preliminary s.42A author with some further information in regards to the suitability of the site for development. The submitter retains their right to provide further information in response to the s42A report and is not bound by the information provided to date.

5 ATTACHMENTS

- Appendix 1 – Table 1 Checklist for Submitters
- Appendix 2 – Conceptual Development Area Plan
- Appendix 3 – Highly Productive Land Assessment
- Appendix 4 – Engineering Service Memorandum
- Appendix 5 – Novo Group – Planning advice on NPS-UD

IN THE MATTER of the Resource Management Act 1991

AND

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

STATEMENT OF EVIDENCE OF SELWYN CHANG

ON BEHALF OF CLIENT TIMOTHY GRAEME BLACKLER (SUBMITTER NO. 231)

25 JUNE 2025

1. INTRODUCTION

1.1 My full name is Selwyn Chang. I am a Charted Professional Engineer (Water Services) and the Principal Civil Engineer (Timaru Lead) at Davis Ogilvie (Aoraki) Limited based in Timaru.

1.2 I hold over 20 years of civil engineering experience, specialising in land development, infrastructure planning, and public servicing solutions. Prior to working with Davis Ogilvie (Aoraki) Limited I spent 15 years working in local government with the Timaru District Council as a Drainage and Water Engineer.

1.3 Through my work at Davis Ogilvie I lead engineering assessments for growth planning, infrastructure feasibility, and rezoning across South Canterbury.

1.4 I am familiar with Pleasant Point's infrastructure network and have prepared this evidence to support the rezoning of 10 Burke Street for Future Urban Zone (FUZ).

Qualifications and experience

1.5 In terms of academic qualifications I hold a:

(a) Bachelors (Honours) degree in Civil Engineering (2004);

from the University of Canterbury NZ

1.6 I am a Chartered Professional Engineer with a practice field of Three Waters competent in drinking water supply systems, wastewater systems, stormwater management, asset management and renewals planning and water safety planning.

1.7 I am an active member of the Engineering NZ Canterbury branch and am committed to continually advancing my professional and advancing skills and capabilities.

2. CODE OF CONDUCT

2.1 I have read the **Environment Court's Code of Conduct for Expert Witnesses** set out in the Environment Court Practice Note 2023. I agree to comply with it while giving this evidence. I confirm that I have not omitted any material facts known to me that might alter or detract from the opinions expressed in this evidence. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I understand my duty to the Hearing Panel is to assist impartially and that this duty overrides any obligation to the party engaging me.

3. SCOPE OF EVIDENCE

3.1 This statement evaluates the technical servicing feasibility of the site at 10 Burke Street, Pleasant Point for future residential development.

3.2 It provides professional opinion on the ability of the site to be serviced for water, wastewater, and stormwater, and responds to the strategic planning context and any infrastructure-related concerns.

4. SITE CONTEXT AND DEVELOPMENT INTENT

4.1 The site is located at 10 Burke Street, currently zoned General Rural Zone (GRUZ) under the Proposed District Plan.

4.2 The submitter seeks to have the site rezoned as Future Urban Zone (FUZ) or an equivalent residential growth designation, with development staging linked to infrastructure capacity and consenting.

4.3 The site is proposed for 50 residential lots with an integrated stormwater reserve and new road access.

5. INFRASTRCUTRE FEASIBILITY – WATER

5.1 The site is in reasonable proximity to Pleasant Point's reticulated water supply.

5.2 A new network connection will be required, with preliminary review indicating that a connection to the nearest main on Burke Street and George Street are technically feasible.

5.3 Detailed hydraulic modelling has not yet been commissioned but based on my understanding on Pleasant Point water supply network there was a level of acceptance from the community that the Level of Service particularly pressure within the network will be reduced significantly during firefighting event.

5.4 This usually can be mitigated with strategic booster pump station within the reticulation (partial or targeted public benefits), or within the proposed development site (developer benefit) or at the Pleasant Point water treatment plant (wider public benefits).

5.5 The submitter is willing to fund required network extensions within the development and any form of contributions to the upgrades that have targeted or wider public benefits that have inclusion of the proposed site to ensure no adverse impact on the wider network.

5.6 Consultation to understand Council investment position and potential collaboration to their renewals and upgrades infrastructure plan will be recommended to understand the degree of hydraulic modelling to be undertaken during the subdivision or Engineering approval stage.

6. INFRASTRUCTURE FEASIBILITY – WASTEWATER

6.1 The site is in reasonable proximity to Pleasant Point's wastewater network and George Street Pump Station that pumps wastewater to Pleasant Point wastewater treatment plant.

6.2 Currently there is downstream capacity and overflow issues in Pleasant Point wastewater network during the peak period (e.g. wet weather due to infiltration) and hence potentially limiting potential growth at Pleasant Point.

6.3 A solution with a proposed centralised pump station and wetwell storage within the site to manage flows and allow modulated discharge during off-peak periods into Council network could mitigate the capacity during the peak period.

6.4 Wastewater modelling, pump sizing, and discharge profiles will be included in the Engineering Approval phase.

7. INFRASTRUCTURE FEASIBILITY – STORMWATER

7.1 The site's topography and hydrology allow for on-site stormwater attenuation and treatment, with discharge likely directed to a nearby natural watercourse or via infiltration (subject to further geotechnical testing).

7.2 A wetland or detention basin is proposed, designed to comply with Land and Water Regional Plans requirements.

7.3 If necessary, flood modelling will be undertaken to determine appropriate Finished Floor Levels (FFLs) and manage flood risk.

7.4 The stormwater management consenting approach will be similar to 16 Horton Street Development which is adjacent to this site which have been granted. This suggest the approach is viable.

8. FUNDING AND NETWORK INTEGRATION

8.1 All infrastructure within the development, including water, wastewater and stormwater systems pump, will be fully developer-funded.

8.2 Where network upgrades are required and have broader public benefit, the submitter supports proportional funding contributions, in line with Council's Financial and Development Contributions Policies.

8.3 This ensures the development proceeds without imposing undue burden on Council infrastructure budgets or LTP priorities.

9. CONCLUSION AND RECOMMENDATION

9.1 The site at 10 Burke Street is technically feasible to service for water, wastewater, and stormwater, subject to detailed engineering design, modelling and consenting processes.

9.2 All new servicing infrastructure will be funded and constructed by the developer, and no development will proceed until network capacity is confirmed and all relevant regulatory approvals are secured, unless public benefit is demonstrated.

9.3 I recommend the site be rezoned as Future Urban Zone (FUZ) with infrastructure-related triggers, to enable timely, staged manner aligned with verified servicing capacity and consenting requirements.

Selwyn Chang
Principal Civil Engineer

BEng (Civil), CPENG, CMEngNZ

Davis Ogilvie (Aoraki) Ltd

25 June 2025

Contractor to locate all existing services & verify all dimensions before commencing work

Issue	Date	Reason	Approved
A	06/25	For Client	GPM

NORTH

Client: Glenhays Investments Limited

Address: 10 Burke Street, Pleasant Point
Appellation: Lot 2 DP 5504
RT Reference: CB9A/438
Total Area: 10.5952ha

- All dimensions in metres unless shown otherwise;
- Existing boundaries adopted from LINZ online database;
- For dimensions, areas, easement, covenants and consent notice information, refer to CB9A/438 and Lot 2 DP 5504
- Aerial Photography: Sourced from LINZ Database under Creative Commons Attribution 4.0 International;
- This plan is in terms of NZGD2000 Timaru Circuit;
- Use of this plan for other purposes or its reproduction in part or full is not permitted without the prior consent of Davis Ogilvie (Aoraki) Ltd;
- A full assessment of easements will be undertaken prior to final survey and subsequent to proposed servicing and engineering requirements being confirmed;
- All dimensions and areas are subject to final legal survey;
- Services are sourced from Canterbury Maps and are indicative only;

RS 16698

Part Lot 1
DP 5504

Lot 2
DP 5504
RT CB9A/438

Part Lot 1
DP 17452

Indicative riparian margin to protect Pleasant Point Stream and provide public access.

Pleasant Point Stream

Care Facility

Pedestrian Links to proposed 27 allotment residential subdivision and greater Pleasant Point

SW

SW

Indicative Stormwater Management with Native Plantings (Not a Pond)

Part Lot 1
DP 5504

Part Lot 1
DP 3978

Burke Street
Legal Road 20.12 wide
Sealed Formation

Frederick Street
Legal Road 20.12 wide
Sealed Formation

George Street
Legal Road 20.12 wide
Sealed Formation

Pedestrian links to domain / golf course

Key:

- Proposed Residential Village
- Not for Residential Built Form
- Primary Road
- Secondary Road
- Proposed Pedestrian and Cycleway Footpath
- Proposed Pedestrian Footpath
- Site Boundary
- Indicative Stormwater Connection
- Indicative Stormwater Management
- Care Facility
- Existing Stream
- Potential Esplanade Reserve
- Pedestrian Links

CAD ref: C:\12dS\data\DO-TIMARU\30661 TM - 10 Burke Street, Pleasant Point_1110\06 CADD\Dwg\DOA - 30661 - Outline Development Plan - OD01 - A.dwg

DAVIS OGILVIE

Davis Ogilvie (Aoraki) & Partners Ltd
Engineers - Surveyors - Planners
12 The Terrace, Timaru 7940
P.O. Box 359 Timaru, NZ
Ph. 03 688 8350 / 0800 888 350
Also - Nelson, Christchurch, Greymouth

Residential Village and Care Facility
Outline Development Plan

Glenhayes Investments Limited
10 Burke Street, Pleasant Point

Design	Drawn	QA Check	DWG	Issue
	KD	GPM	OP01	A
Scale @ A3	Date	File		
1:2000	06/25	30661		

Pleasant Point Demographics Commentary

Brief

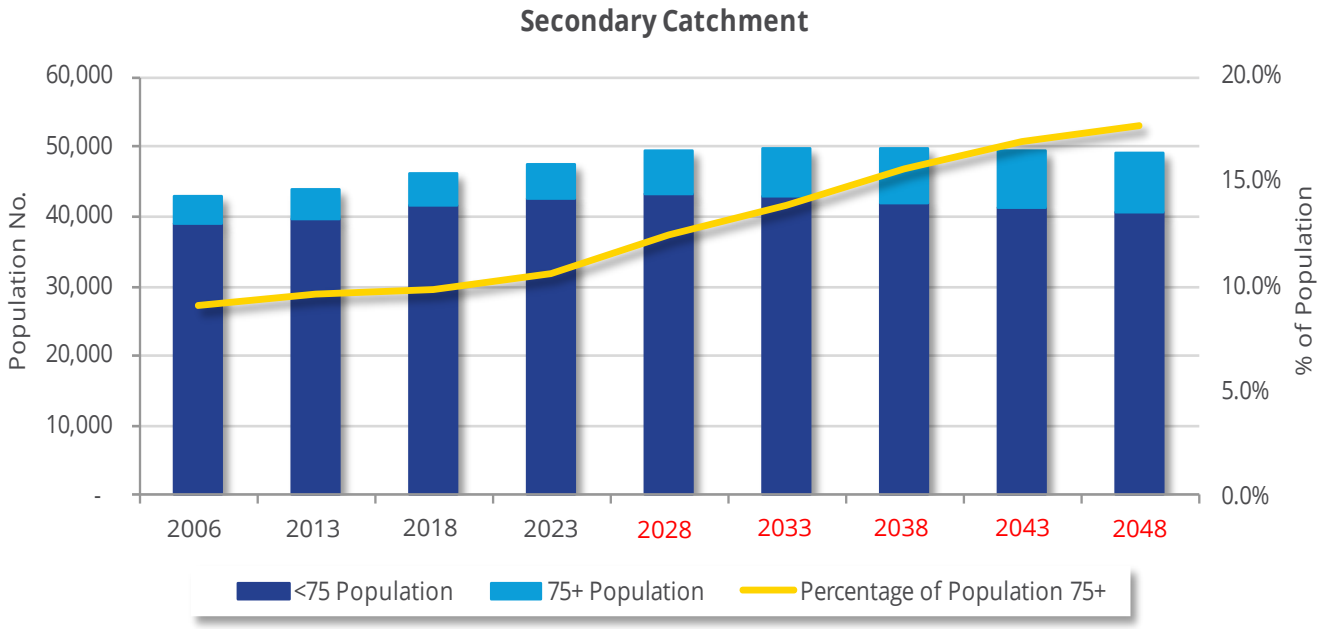
We have been asked to provide information on the Demographic Profile of Pleasant Point and future population growth based upon the results of the now available 2023 Census data and with emphasis on population that are potential residents of a retirement village and/or residential aged care facility if developed in Pleasant Point. This report is prepared as at June 2025.

Population Analysis

Pleasant Point is a rural town in South Canterbury, located within the Timaru District. Pleasant Point in situated on State Highway 8, approximately 18.5 kilometres north-west of Timaru.

We have analysed population statistics from last census data together with population projections for the Pleasant Point and immediate surrounds (Primary Catchment) and Timaru District. (Secondary Catchment). **Note**: We have not included further afield Waimate District or McKenzie District, confining our comments and findings to local catchment and wider Timaru District.

We illustrate these statistics for the secondary catchment below:-



Note the population projections graphed above for 2028 – 2048 (in red) are based off the 2018 Census. This is because updated population projections as at 2023 have not yet been released by StatsNZ.

We detail the key population metrics in comparison to the primary catchment, secondary catchment and the wider New Zealand population below:-

Component	Primary Catchment	Secondary Catchment	New Zealand
2018 Census Population	1,371	46,296	4,699,755
2023 Census Population	1,428	47,547	4,993,923
Population increase from 2018	4.2%	2.7%	6.3%
2023 Census Population 75+	126	5,055	362,655
2023 Population 75 as % of Total Pop.	8.8%	10.6%	7.3%
2048 Projected Population	1,510	49,300	6,077,470
Population increase from 2023 - 2048	5.7%	3.7%	21.7%
2048 75+ Projected Population	255	8,710	804,610
2048 Population 75+ as % of total Pop	16.9%	17.7%	13.2%
75+ Population increase from 2023 - 2048	102%	72%	122%

Note the population projections tabled above for 2048 are based off the 2018 Census. Updated population projections as at 2023 have not yet been released by StatsNZ.

Information relating to 2023 is based off the 2023 Census (latest available).

As tabled above, projections from the 2018 census shows that overall total population growth to 2048 across the primary and secondary catchment is subdued in comparison to New Zealand. However, both areas are projected to have a significant 75+ population as a percentage of total population, greater percentage than New Zealand as a whole.

Whilst the 75+ population growth from 2023 to 2048 is not in percentage terms as significant as New Zealand, we consider there to be a reasonable base of aged people within the primary and secondary catchments.

The statistics above also suggests that whilst the projected number of elderly persons in the district is expected to increase, there is relatively static growth due to diminishing younger population which will impact on population growth in the longer term future beyond 2048. This could potentially affect demand for aged care accommodation. Offsetting this is the potential for retirement village residents and ultimately residential care users to come from further afield beyond Timaru District. This has been evidenced in Geraldine where a 100 plus units' village has been developed and filled quickly, when the local population demographics indicated this would be too large a complex for local needs.

The median personal income for Pleasant Point was $40,000 as at 2023 Census. The median personal income for Timaru District was $38,600 per person, whilst for New Zealand, the median income was $41,500 per person. Income statistics for Timaru District indicate a slightly lower socio-economic profile which impacts upon whether the residents in any care facility are more likely to be subsidised or private fee-paying individuals and also the affordability of premium fees. Similarly, the median income also impacts on potential residents of a lifestyle village to meet the weekly fees component of occupation.

The median house price for Pleasant Point (and surrounding areas) as at May 2025 (latest available) was $624,000. Given a small number of transactional data, this figure is volatile per month and has averaged $490,500 over the prior 12-months. This compares to a median house price of $535,000 for Timaru District in May 2025. Median prices are significantly lower than many other New Zealand cities, more in line with small regional townships. Median house price statistics for Pleasant Point and Timaru District impact on affordability and pricing of retirement village ORA units.

Competition - Care Facilities

In terms of competition to any proposed retirement focused development, we consider demand and competition will be drawn from further afield than Pleasant Point alone, thus have looked to demand and supply across the secondary catchment of Timaru District. There are 10 care facilities located within the secondary catchment, we note these below:

Care Facilities - Secondary Catchment

Name	City/Town	Rest Home / Hospital	Dementia	Psychogeriatric Hospital	Serviced Units	Total
Geraldine Retirement Village	Geraldine	10	-	-	10	20
Waihi Lodge Care Centre	Geraldine	21	-	-	-	21
McKenzie Healthcare and Lifestyle Village	Geraldine	51	23	-	10	84
Wallingford Rest Home	Temuka	32	-	-	-	32
Strathallan Lifecare and Village	Timaru	55	20	-	10	85
Glenwood Home	Timaru	45	-	-	-	45
Margaret Wilson Complex	Timaru	70	-	-	-	70
Radius Elloughton Gardens	Timaru	85	-	-	-	85
The Croft Care and Village	Timaru	33	22	20	4	79
Highfield Rest Home	Timaru	44	-	-	-	44
Primary Catchment Beds		446	65	20	34	565

These facilities within the secondary catchment area of Timaru District may provide competition to a Pleasant Point care facility. We note most facilities are situated in Timaru (18.5 km away) or Geraldine (26.5 km away). These 10 facilities provide a total of 565 certified care beds, being 480 rest home and hospital care beds, inclusive 34 serviced occupational right agreement (ORA) units which can provide low level care through to rest home level care or in some cases hospital level care, 65 dementia beds and 20 psychogeriatric care beds.

Care Facility Demand/Supply Commentary

We have analysed potential demand for aged care facility beds by utilising the Statistics New Zealand population data, actual known bed numbers (as shown in table above) and the Aged Residential Care (ARC) 2024 Sector Profile Report.

The ARC 2024 Sector Profile Report utilises national occupancy statistics for the national population above 75 years of age. These statistics indicates that in the order of approximately 9.78% of the national population above 75 years of age are in some form of residential care, of this approximately 8.22% are in rest home or hospital care (including certified ORA units), 1.33% are in dementia care with the remaining 0.23% in psychogeriatric hospital care. If we were to apply these national occupancy statistics to the secondary catchment 75+ population based on the 2023 Census, this would suggest demand as follows:-

National Occupancy Statistics

Care Type	% of 75+ Population	Indicated Demand	Current Supply	Shortfall/Overage
Dementia	1.33%	67 beds	65 beds	-2 beds
Psychogeriatric Hospital	0.23%	12 beds	20 beds	8 beds
Rest Home & Hospital (inc ORA)	8.22%	415 beds	480 beds	65 beds

Utilising the national statistics would indicate a reasonable oversupply of rest home and hospital beds, a slight oversupply of psychogeriatric beds and a near equilibrium for dementia care beds. We caution given the predominately regional locality of the secondary catchment, applying national statistics are not fully robust.

Alternatively, across each of the facilities we have looked to either the latest known occupancy, or reported occupancy as stated on each of the facilities latest Ministry of Health audit reports to derive an indication on demand more specific to the catchment.

Firstly, for rest home and hospital beds, overall occupancy across facilities within Timaru District was reported as 399 beds occupied, or 83.1% occupancy. We note that this occupancy rate is detrimentally impacted by serviced units, as whilst facilities may be certified to provide care in serviced units, each of the four facilities above also provide lower care levels within each serviced unit. This means a unit may be occupied by a resident receiving less than rest home care, which prevents it from being available for a rest home resident, thus impacting on reported occupancy. Of the reported rest home/hospital beds in the secondary catchment area, 7.1% are made up of serviced units. If we were to analyse occupied beds without serviced units, occupancy is reported as 397 beds occupied, or 89.0% occupancy. This indicates that currently, studio units are not being utilised for rest home care.

Utilising these occupancy statistics without including serviced units, indicates a penetration rate of 7.9% of the secondary catchment population over 75 years for rest home and hospital beds. Given the forecast in aging population through to 2048, if the usage demand remains the same at 7.9% there will be a need for say an additional 287 rest home and hospital care beds above current usage by 2048. This would take the total number required to support indicated usage to 684 beds, 238 beds above total current number of rest home/hospital beds. If no extra beds were introduced to the District, the 34 certified serviced units may begin to be occupied by those requiring higher levels of care. Overall, looking to growth projections to 2048, we consider there to be opportunity to increase supply of rest home and hospital beds across Timaru District based on the ageing population.

If we focus on dementia care, average occupancy across the three providers was 59 occupied beds, or 90% occupancy. We note that McKenzie Healthcare recently introduced five new dementia care beds (included in the above table). Our latest knowledge on these beds was that they had not yet opened to the public. Given we have included these beds within our total stock, our reported overall occupancy has been lowered on account of this. Prior to the introduction of the new beds overall occupancy was 98%. Utilising the occupied bed number indicates a penetration rate of 1.2% of the secondary catchment population over 75 years for dementia beds. If the usage demand remains the same at 1.2% there will be a need for say an additional 42 dementia care beds above current usage by 2048. This would take the total number required to support indicated usage to 101 beds, 36 beds above total current number of rest home/hospital beds. On this basis, we consider there is opportunity into the future to increase supply slightly for dementia care beds based on the ageing population.

The sole provider of psychogeriatric hospital care was operating at 100% occupancy (20 beds). Given there is only one facility, currently operating at 100%, this likely indicates that demand surpasses supply, and there is immediate potential for an increase to psychogeriatric care bed numbers in the District. Notwithstanding this, utilising the current occupied bed number indicates a penetration rate of 0.4% of the secondary catchment population over 75 years for psychogeriatric care beds. If the usage demand remains the same at 0.4% (although we suspect there is immediate provision for this to be higher with some potential assed residents leaving the district as current accommodation is full), there will be a need for say an additional 14 psychogeriatric care beds above current usage by 2048. This would take the total number required to support indicated usage to 34 beds. On this basis, we consider there to be immediate opportunity, and into the future to increase supply slightly for psychogeriatric care beds. We do however note that this high-level specialised care service is not to all operators taste.

Competition - Retirement Villages

There are a number of retirement villages located within the secondary catchment, we note these below:

Retirement Villages - Secondary Catchment

Name	Location	Serviced Units	Independent Units	Total
Geraldine Retirement Village	Geraldine	10	-	10
McKenzie Healthcare and Lifestyle Village	Geraldine	10	113	123
Strathallan Lifecare and Village	Timaru	47	51	98
Glenwood Home	Timaru	-	17	17
Radius Elloughton Gardens	Timaru	-	54	54
The Croft Care and Village	Timaru	13	11	24
Mountainview Retirement Village	Timaru	-	95	95
Total Number of Units		80	341	421

In terms of retirement villages, at present, there are seven retirement villages across the secondary catchment providing some form of license to occupy via either a serviced or independent unit. There are a total of 80 serviced units and 341 independent units across the secondary catchment. Again, these villages are situated within Geraldine and Timaru. All these villages except Mountainview are integrated with an aged care facility. We note the village structure of Mountainview differs slightly from a typical retirement village, as each unit is sold via resident to resident, with a 10% commission paid to the Trust.

Retirement Village Demand/Supply Commentary

New Zealand is on track for significant growth in the over 75 population. As the baby boomer population head towards retirement there will be a significant increase to demand for aged care and retirement living accommodation. We expect that with an average entry age of say 75 years then demand is likely to be at its peak anywhere between now and say 2035.

Retirement Village Association (RVA) data states there are approximately 43,332 retirement village units across 422 villages throughout New Zealand. Within these units there are approximately 53,000 residents equating to 1.22 resident per unit. Based on the 2023 Census population this would equate to approximately 14.6% penetration rate of the 75 plus age group.

The significant players in the industry include Ryman, Summerset, Arvida, Metlifecare, Oceania and Bupa. The largest cities including Auckland, Wellington and Christchurch, together with those coastal locations such as Bay of Plenty and Nelson attract the greatest retirement living reflective of either ageing in place (i.e. staying close to home) or a flight to warmer climate to retire (i.e. Nelson and Bay of Plenty).

The lower penetration rates are seen in less populated towns and less desirable retirement localities (i.e. Southland, West Coast). Notwithstanding this, the ageing population is having an impact on all major cities and smaller towns where the current supply won't keep up with demand going forward.

For the subject secondary catchment, there are currently approximately 421 retirement village units or approximately 515 residents. This equates to a penetration rate of 10.2% based on the over 75 population for the locality. If we apply the same penetration rate to the 2048 projected population for the catchment, then there will be a need for approximately 725 units in total, being an increase of 304 units from the current stock over the 23 years.

We caution that applying the same penetration rate may not be exact as this implies that supply of units is increasing at a rate in the same proportion to population growth which is unlikely to be accurate however does provide a reasonable guide as to future trends.

The above forecast for an additional 304 units demanded by 2048, or 13 units per annum warrants further retirement living development across the Timaru District. We are unaware of any imminent development in the near future across the above tabled villages. Geraldine Retirement Village holds development land for a proposed village expansion of independent villas. McKenzie Village also holds a small parcel of land for proposed future apartment development. Even if both villages were to commence pipeline development, we consider there to remain opportunity for further development. The proposed subject site would benefit from being the sole retirement living provider in Pleasant Point and surrounding areas (within a 17-kilometre radius). Thus, we would anticipate any retirement village development providing new, high-quality accommodation and community facilities to draw a large pool of interest from the wider community.

Conclusion

We have undertaken an analysis of current supply and indicated demand for the retirement village industry inclusive care facilities and ORA units across the Timaru District catchment utilising the 75+ population as stated in the 2023 Census and population projections.

We have focused on the wider secondary catchment over Pleasant Point alone as for either a care facility or a retirement village operation to be successful within Pleasant Point, it will need to attract residents from beyond the immediate hinterland and out to and including Timaru, Temuka and other townships and settlements within the District and potentially beyond. We see this as a long project not without risk associated as to the scale of any complex, and the ability to attract both staff and residents. This is not unusual in retirement village green fields developments but there are many examples of successful villages developed outside major metropolitan areas- including MacKenzie Retirement Village, Boulevard Retirement Village, Rolleston, Observatory Retirement Village Oamaru, and care facilities in small townships.

The proposed complex has the benefit from being the sole care facility within a 14-kilometre radius of Pleasant Point, and sole village within a 17-kilometre radius of Pleasant Point. Depending upon village design and density, persons aged 75+ currently residing in the rural hinterland of Timaru District can be provided with the opportunity to remain in a rural environment, opposed to relocating into more intensively developed villages in built up urban areas such as Geraldine and Timaru.

Our analysis indicates that in terms of demand for aged care facilities, dementia and psychogeriatric beds appear to be fully utilised, or near fully utilised therefore indicating demand for immediate further supply. In terms of rest home/hospital beds, there appears to a current slight over supply, based on indicated occupancy levels. We anticipate this to abate over time and reach equilibrium by say 2032. Therefore, based on the aging population to 2048 we conclude there needs to be provision for future care beds development across Timaru District.

Regarding retirement living, we anticipate a village offering new ORA units would be welcomed by the local community, providing a modern retirement community and potential to support local business enterprises and Timaru services. Projected demand supports the need for future development across Timaru District to service the aging population.

If there is any additional information or action you require of us, please so advise.

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APPENDIX E

Statement of Evidence (Andy Carr – Carriageway Consulting)

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a submission made under clause 6 of the First Schedule to the Resource Management Act 1991, in relation to the Proposed Timaru District Plan – Hearing G (Growth Chapter)

STATEMENT OF EVIDENCE OF ANDREW DAVID CARR

1. INTRODUCTION

1.1 My full name is Andrew ("Andy") David Carr. I am a director of Carriageway Consulting Limited, a specialist traffic engineering and transport planning consultancy which I founded at the start of 2014.

Qualifications and experience

1.2 In terms of academic qualifications, I hold a:

(a) Bachelors (Honours) degree in Computing Science (1988);

(b) Masters degree in Transport Engineering and Operations (1989); and

(c) Masters degree in Business Administration (1998),

all from the University of Newcastle upon Tyne in the United Kingdom.

1.3 I am a Chartered Professional Engineer with a practice field of Transportation Engineering, and an International Professional Engineer (New Zealand section of the register).

1.4 I have more than 35 years' experience in traffic engineering during which I have been responsible for investigating and evaluating the traffic and transportation impacts of a wide range of land use developments, in New Zealand for the past 21 years and the United Kingdom prior to that. I have also been a hearing commissioner and have acted in that role for Greater

Wellington Regional Council, Ashburton District Council, Waimakariri District Council and Christchurch City Council.

1.5 Prior to establishing Carriageway Consulting, I was employed by traffic engineering consultancies in which I had senior roles in developing the business, undertaking technical work and supervising project teams primarily within the South Island.

1.6 I am a Chartered Member of Engineering New Zealand (formerly the Institution of Professional Engineers New Zealand), and an Associate Member of the New Zealand Planning Institute.

1.7 I also served on the National Committee of the Resource Management Law Association between 2013-14 and 2015-17, and I am a past Chair of the Canterbury Branch of the organisation.

1.8 I have provided transportation advice for a number of retirement village proposals schools, examples of which include:

(a) Northbrook Retirement Villages (Wanaka, Arrowtown and Christchurch);

(b) Ryman Retirement Villages (Dunedin, Christchurch, Rangiora);

(c) Arrowtown Lifestyle Retirement Village;

(d) Aspiring Lifestyle Retirement Village, Wanaka;

(e) The Observatory Retirement Village, Oamaru; and

(f) Radius Clare House, Invercargill.

1.9 I have also carried out peer reviews of applications for retirement villages on behalf of local authorities and submitters.

1.10 As a result of my experience, I consider that I am fully familiar with the traffic characteristics of this type of land use activity.

Involvement in the Application

1.11 I was engaged by Glenhays Investments Limited (the company of which the Submitter, Mr Blackler, is a Director) in 2023 to undertake an assessment of the expected traffic and transportation effects of its proposal to construct and operate a retirement village at 10 Burke Street, Pleasant Point. As part of this, I visited the site during March 2023 and subsequently produced a

Transportation Assessment, which considered in detail the expected outcomes on road safety and transportation efficiency arising from the development. I understand that this report formed part of the submission of Mr Blackler.

1.12 In June 2025, I was asked to update this report, to take account of the revised composition of the proposed retirement village.

1.13 I adopt and rely on those reports for the purpose of my evidence, other than where modified below.

1.14 My evidence will address:

(a) the traffic-related effects of the proposal (being a summary of the updated Transportation Assessment); and

(b) my response to the traffic matters raised in the Council's consultant planner's (Mr Bonis) section 42A report and accompanying report of the Council's consultant traffic engineer (Mr Collins).

Expert Witness Code of Conduct

1.15 I have read the Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note (2023) and I agree to comply with it. I can confirm that the issues addressed in this statement are within my area of expertise and that in preparing my evidence I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

2. SUMMARY OF UPDATED TRANSPORTATION ASSESSMENT

2.1 The updated Transportation Assessment is attached as Appendix A to this Statement of Evidence.

2.2 In brief, my initial assessment was carried out on an expected yield of 35 units for independent living, 20 beds that could be used for various levels of care, and 20 beds for residents with dementia. The current proposal for the site is yield of 53 units for independent living and 45 beds for residents with dementia.

2.3 As I set out in Section 6 of the updated Transportation Assessment, applying standard trip generation rates means that this will result in 33 vehicle movements in the weekday 'commuter' peak hours and 271 vehicle movements per day. This compares to 22 and 191 vehicle movements

respectively under the previous proposal; that is, the current proposal has higher traffic generation.

2.4 However the absolute volumes of vehicles remain low. For example, 33 vehicle movements in the peak hours represents one additional vehicle on the roading network every 1.8 minutes at the busiest times. Accordingly when I updated the assessment of effects on the roading network (Section 7 of the Transportation Assessment), my conclusions remained unaltered. The greatest change at the nearest intersections is an increase of 0.1 vehicle lengths in the queue, and 0.1 seconds per vehicle of additional delay, and in my view these changes would be imperceptible.

2.5 I highlight that my analysis has adopted a 'worst case' outcome, of all traffic using just one point of access to the site. For this, I assigned all traffic onto George Street, as this carries the highest traffic flows. In the event that all traffic was to use Burke Street, or traffic was to use both Burke Street and George Street, the effects on queuing and delay would be even smaller than described in paragraph 2.4 above.

2.6 I have taken the opportunity to update the assessment of reported crashes in the area (Sections 4.3 and 7.3 of the Transportation Assessment). Four crashes have been recorded in the vicinity of the site over the past ten years but three of these relate to unlawful driver behaviour (road rage, intoxication and cellphone use, and evading police) with the other crash potentially involving the driver experiencing a medical event (as described in the police report). I therefore do not consider that there is any evidence of an underlying road safety issue on the roading network. Therefore the low traffic generation of the retirement village will not, in my view, give rise to adverse road safety effects.

2.7 I have evaluated the effects of the additional traffic on the geometries of the roads adjacent to the site (Section 7.4 of the Transportation Assessment). The increase in traffic flows would not, in my view, require any improvements to be made to the surrounding road geometries.

2.8 Because the proposal is for a rezoning, there is no firm layout for the development. However an Outline Development Plan has been produced, together with an indicative site layout (as shown in Section 5 of the Transportation Assessment) which is derived from the Outline Development Plan. In Section 8 of the Transportation Assessment, I reviewed the indicative site layout for compliance with the District Plan and identified a number of matters where revisions were required. However I do not consider that these are fundamental concerns, and they can be 'designed out' in due

course. Accordingly, in my view the Outline Development Plan represents a viable and realistic overarching layout for the site.

2.9 I also assessed parking demand at the site (Section 8.5 of the Transportation Assessment) and found that the site could amply meet the likely demand. As such, I do not expect that there will be any additional car parking occurring on the surrounding roads.

2.10 Consequently, having updated the Transportation Assessment for the increased yield of the retirement village, I remain able to support the proposal from a transportation perspective.

3. RESPONSE TO COUNCIL OFFICERS

3.1 I have reviewed the s42A report of the Council's consultant planner, Mr Bonis, who refers to a technical report on transportation matters by Council's consultant traffic engineer, Mr Collins.

3.2 Mr Bonis notes (his paragraph 12.7.6) that "*it is unclear as to how the 'potential link' from George Street would be provided; nor whether the conclusion that the network can absorb the development, has extended to a GRZ (rather than a specific retirement complex proposal). Mr Collins considers that there is insufficient detail provided to consider the transport consequences of the proposal*".

3.3 I have reviewed the report of Mr Collins, and note that he refers to the site as generating more than 50 vehicles per hour (his paragraph 3.3). I do not agree with this in respect of the retirement village, as my analysis indicates a traffic generation rate of 33 vehicles per hour. Mr Collins also describes this as being a "*moderate and large scale effect*". I disagree with this characterisation, since the scale of the retirement village increases traffic flows by an average of one vehicle movement every 1.8 minutes at the very busiest times.

3.4 Mr Collins considers that the submission may result in effects that cannot be adequately managed through resource consent processes, or that insufficient information has been provided to understand the effects of rezoning. With regard to the proposed retirement village, I do not agree with Mr Collins, rather, a detailed assessment of the effects has been undertaken.

3.5 However I understand that Mr Blackler has sought that the site is rezoned to General Residential Zone (**GRZ**). On my reading of the Proposed District Plan (SUB-S1), this zoning anticipates subdivision to lots of 450sqm in size. The

site is 10.5ha in size, but I am advised that in practice only 6.4ha of this would be rezoned. Applying a typical rate of one third of this being used for roading, stormwater management and other infrastructure, this suggests that the site could accommodate around 95 residential lots if the minimum lot size was used throughout.

3.6 My analysis of the traffic effects has been based on a retirement village generating 33 vehicle movements in the peak hour. Applying the standard traffic generation rate for residential activity means that this equates to 33 residential lots (or around a third of the yield that could potentially be achieved under the GRZ zoning sought).

3.7 I therefore agree with Mr Bonis and Mr Collins, that the full extent of development that could occur under the requested rezoning has not been evaluated.

3.8 That said, I consider that it is also important to recognise that it would not be possible to develop more than 39 residential lots as a Permitted or Controlled Activity because of Rule TRAN-R10 of the Proposed District Plan. This addresses 'high trip generation activities', and when 40 or more residential units are proposed, the activity becomes a Restricted Discretionary Activity with a 'Basic' Transportation Assessment being required. Importantly, this Rule applies irrespective of whether the land is zoned for residential development or not.

3.9 I therefore disagree with Mr Collins' statement that rezoning the site as sought may result in effects that cannot be adequately managed through the resource management process. Rather, the mechanism by which development is managed is through Rule TRAN-R10, which limits development and requires the provision of information at a later time to understand the transportation effects of more than 39 residential lots. In the event that the adverse transportation effects are significant, then Council is able to decline any resource consent application even though the development might be for residential activity on a site that is zoned for residential purposes.

3.10 In short, Rule TRAN-R10 gives Council a 'second bite of the cherry' with regard to assessing the transportation effects. Regardless of whether the transportation effects are assessed at the rezoning stage, it is still then necessary to carry out an assessment for any residential development of 40 or more residences when a resource consent application is made.

3.11 While I acknowledge that the assessment has been of the equivalent of 33 standard residential lots, the difference between this and 39 lots (being the greatest size of residential development that could occur before the application becomes a Restricted Discretionary Activity requiring an assessment of transportation effects) is small. The difference in traffic volumes is just 6 vehicle movements at the busiest time, which would be imperceptible and would not lead to adverse efficiency or road safety effects.

3.12 Overall then, in my view, it is not clear whether Mr Bonis and Mr Collins formed their opinions on the submission taking into account the limiting effects of Rule TRAN-R10, which effectively means that development of 40 lots or more cannot take place without an assessment of the transportation effects as part of the resource consent application. As noted above, if these effects are not considered to be benign, then the resource consent application can be declined.

3.13 I agree with Mr Bonis' view that it is not clear how a link to George Street could be formed. However in my updated Transportation Assessment I addressed the scenario where all traffic associated with the proposed retirement village would use Burke Street, and I did not identify any adverse transport effects. If such effects were to arise under a larger development under a GRZ zoning, then these would be required to be assessed under Rule TRAN-R10, as I discuss above.

3.14 Taking into account the scope of Rule TRAN-R10 and the effects that it has on limiting the scale of development without further assessment of the transportation effects, and the small difference between the lower threshold of the Rule and my assessment (the equivalent of just 6 vehicle movements in the busiest hour), I am able to support Mr Blackler's submission for a GRZ zoning on the site.

Andy Carr

25 June 2025

Appendix A

Glenhays Investments Limited

Proposed Retirement Village
Pleasant Point

Transportation Assessment

CARRIAGEWAY
CONSULTING
traffic engineering | transport planning

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1. Introduction

1.1. Glenhays Investments Limited proposes to develop a retirement village at a site in Pleasant Point, South Canterbury (‘**the site’**). In order to facilitate this, the Director of Glenhays Investments Limited, Mr Blackler, has lodged a submission to the Proposed Timaru District Plan seeking that the site is rezoned.

1.2. It is understood that the proposed retirement village will comprise 53 residential villas for independent living and a care facility with up to 45 beds for residents with dementia. There will also be ancillary facilities for residents of the retirement village and areas to support the operation of the faculty, such as staff offices.

1.3. This report sets out an assessment of the likely transportation issues associated with the development of a retirement village at the site, including changes in travel patterns that are likely to arise. Where potential adverse effects are identified, possible ways in which these can be addressed are set out.

1.4. This report is cognisant of the guidance specified in the New Zealand Transport Agency’s ‘*Integrated Transport Assessment Guidelines’* and although travel by private motor vehicle is addressed within this report, in accordance with best practice the importance of other transport modes is also recognised. Consequently, travel by walking, cycling and public transport is also considered.

1.5. The qualifications and experience of the report author are set out in Appendix A.

2. Site Overview

2.1. Location

2.1.1. The site is located towards the northeast of Pleasant Point, approximately 600m from the town centre. It is presently zoned as Rural 1 and Rural 2 in the Timaru District Plan (**District Plan**) with an area to the immediate southeast of the site being formally designated as a Works Yard.

2.1.2. The location of the site in the context of the wider area is shown in Figure 1, with the immediate environs of the site shown on Figure 2.

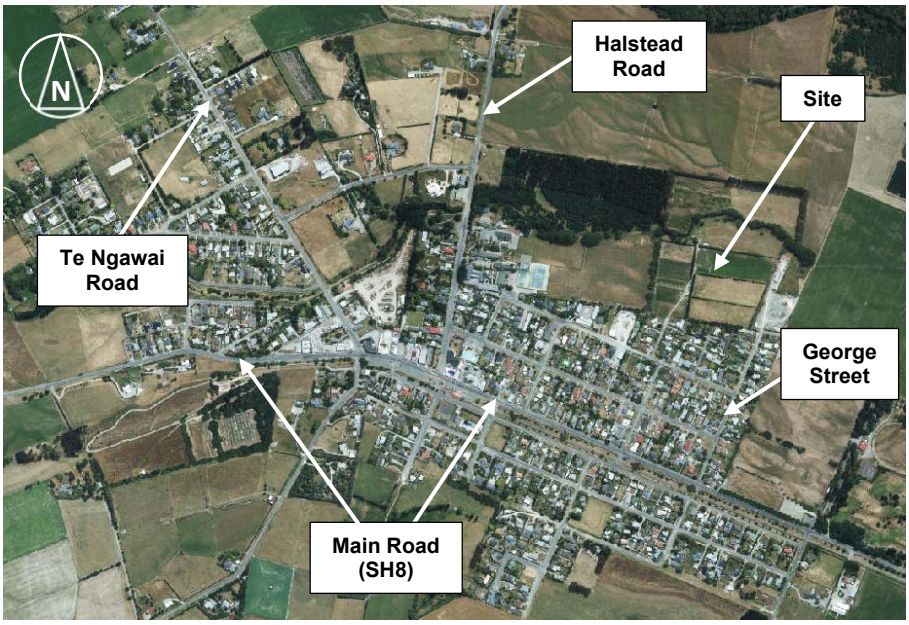


Figure 1: General Location of Site

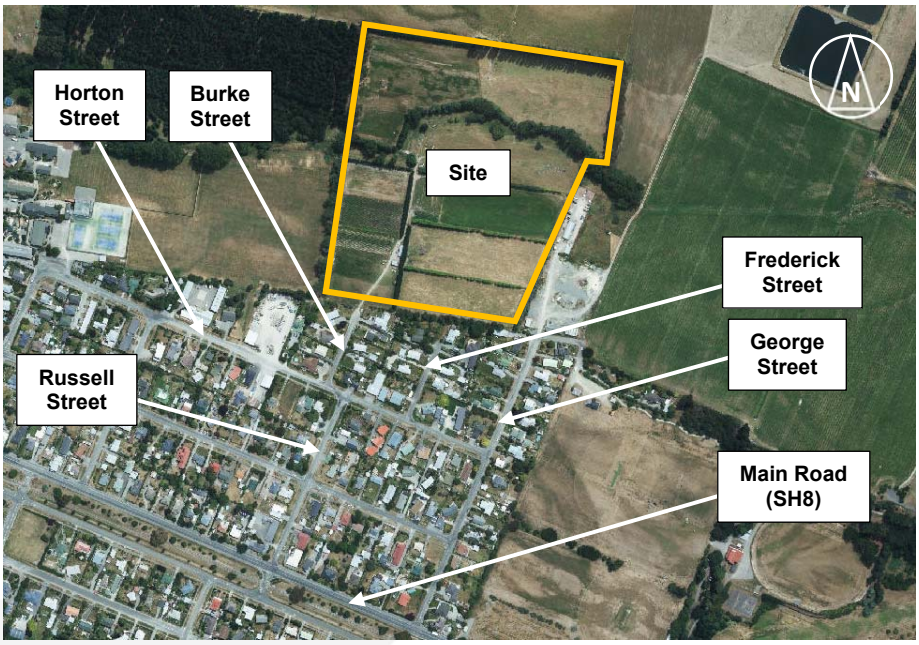


Figure 2: Aerial Photograph of Site and Environs

2.2. Roading Classification

2.2.1. The District Plan classifies the surrounding roads as follows:

- Main Road (State Highway 8): National Route; and
- Burke Street, George Street, Frederick Street, Horton Street, Russell Street: Local Roads

2.2.2. This indicates that Burke Street, George Street, Frederick Street, Horton Street and Russell Street are all expected to provide for local property access, with Main Road accommodating through traffic.

3. Current Transportation Networks

3.1. Roading Network

3.1.1. All roads in the immediate area of the site are subject to a 50km/h speed limit. None have any parking restrictions and all are characterised by having private lot accesses (driveways) over their length.

3.1.2. At its southeastern corner, the site is in close proximity to George Street and a connection to that road is proposed. George Street has a flat and straight alignment with a 7m seal width and kerb+channel on the eastern side but a rural formation with shoulder and swale on the western side. It does not have any carriageway markings.

Photograph 1: George Street Looking South

3.1.3. Approximately 400m south of the site, George Street connects to Main Road at a priority ('stop') intersection. The intersection does not have any auxiliary turning lanes but there is a widened seal on each side which can be used by one vehicle to pass another which is turning. Sightlines to the east and west are excellent.

Photograph 2: Main Road / George Street Intersection Looking East

Photographs 3 and 4: Sightlines to the East and West at the Main Road / George Street Intersection

3.1.4. Main Road forms part of State Highway 8, and has 7.4m movement lanes (3.7m in each direction) separated by a centreline. The northern side of the road has a parking lane of 3.3m width but the formation on the southern side is of a rural nature with a 2.5m wide sealed shoulder and grass verge. The highway has a flat and straight alignment, and is subject to a 70km/h speed limit.

Photograph 5: Main Road Looking West

3.1.5. To the west, Main Road runs though Pleasant Point town centre and then extends towards the centre of the South Island via Lakes Tekapo, Pukaki and Dunstan and before turning south and east, terminating at Milton, south of Dunedin. To the east, Main Road connects to State Highway 1 just north of Timaru.

3.1.6. Burke Street lies at the southwestern corner of the site. This has a 5.7m wide seal, with shoulders and verges on each side. It has no carriageway markings, and the alignment is flat and straight.

Photograph 6: Burke Street Looking South

3.1.7. Burke Street meets Horton Street at a priority intersection, although there are no formal markings or signage provided (standard 'road rules' mean that Horton Street traffic retains priority). Sightlines at the intersection are excellent.

Photograph 7: Horton Street / Burke Street Intersection Looking East

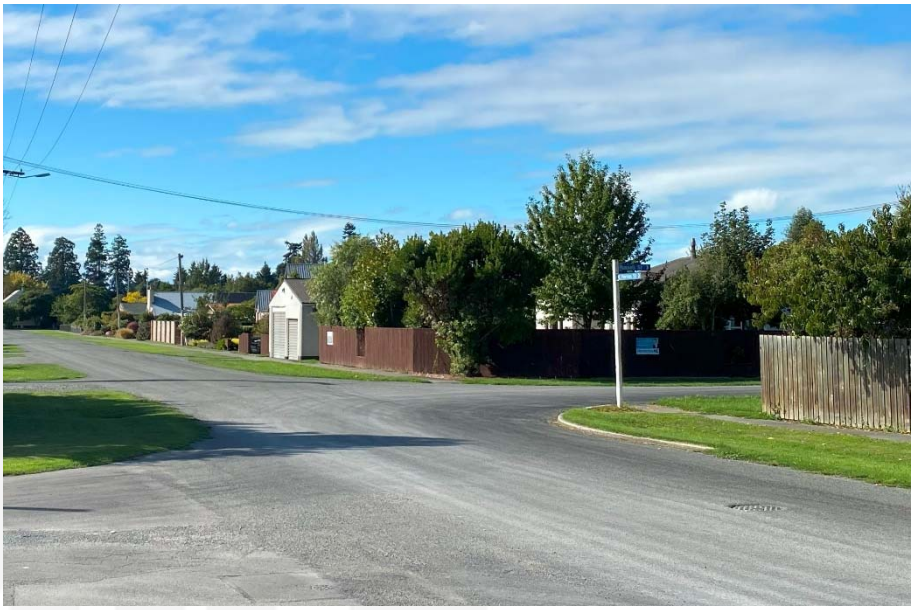
3.1.8. Horton Street has a flat and straight alignment, and in the vicinity of Burke Street has a 7m wide seal. The road is marked with a centreline, and has swales / verges on each side.

Photograph 8: Horton Street Looking West

3.1.9. At eastern end, Horton Road joins George Street at a priority intersection, which has no carriageway markings or signage (although standard ‘road rules’ mean that George Street traffic retains the right-of-way).

Photograph 9: George Street / Horton Street Intersection Looking North

3.1.10. Approximately 24m east of the Horton Street / Burke Street intersection, Russell Street joins Horton Street from the south at a priority intersection. The intersection has no signs or markings, although standard 'road rules' mean that traffic on Horton Road retains the right-of-way.



Photograph 10: Horton Street / Russell Street Intersection Looking East

3.1.11. Russell Street has a flat and straight alignment and a 7m wide carriageway. It is formed with a rural type of configuration with shoulders and swales on each side.

Photograph 11: Russell Street Looking South

3.1.12. Russell Street joins Main Road at a priority ('stop') intersection approximately 200m west of George Street. The intersection does not have any auxiliary turning lanes but there is a widened seal on each side which can be used by one vehicle to pass another which is turning. Sightlines to the east and west are excellent. Russell Street also continues southwards, crossing a railway line and serving a residential area.

Photograph 12: Main Road / Russell Street Intersection Looking North

3.2. Non-Car Infrastructure

3.2.1. Although the area is developed for residential activity, the extent of footpath provision is variable. There are no footpaths on Burke Street, and only one footpath on Horton Street, George Street, Russell Street and Main Road. The footpaths are generally 1.2m wide, but due to overgrowing vegetation, the useable width is typically around 1.0m.

3.2.2. There are no formal pedestrian crossing facilities in the area. There is no formal cycling infrastructure provided.

3.2.3. Pleasant Point does not have any bus services and so there is no bus infrastructure in the area.

3.3. Future Changes

3.3.1. There are no known changes to the roading environment in the immediate area that are set out in any overarching strategies or guides.

4. Current Transportation Patterns

4.1. Traffic Flows

4.1.1. Waka Kotahi carries out regular traffic flows on the whole state highway network. The closest traffic counter on Main Road is located 1km east of George Street, near the domain (counter id:00800013) which showed that in 2024, the highway carried an average of 4,400 vehicles per day.

4.1.2. A more detailed assessment of this counter showed the following:

- Average weekday morning peak hour (8am to 9am):
  - Towards Pleasant Point: 144 vehicles
  - Towards Timaru: 212 vehicles
  - Total traffic volume: 356 vehicles
- Average weekday evening peak hour (4pm to 5pm):
  - Towards Pleasant Point: 248 vehicles
  - Towards Timaru: 180 vehicles
  - Total traffic volume: 428 vehicles
- Average Saturday peak hour (11am to 12pm)
  - Towards Pleasant Point: 217 vehicles
  - Towards Timaru: 192 vehicles
  - Total traffic volume: 409 vehicles
- Average Sunday peak hour (1pm to 2pm):
  - Towards Pleasant Point: 163 vehicles
  - Towards Timaru: 174 vehicles
  - Total traffic volume: 337 vehicles

4.1.3. It can be seen that the highway is relatively lightly trafficked, with the maximum peak hour flow being slightly more than 400 vehicles (two-way). Traffic flows are tidal, with the majority of vehicles heading eastwards in the weekday morning peak hour and westwards in the weekday evening peak hour.

4.1.4. Data obtained from the MobileRoad website shows the following daily traffic flows:

- Burke Street: 60 vehicles (two-way);
- George Street: 220 vehicles (two-way);
- Frederick Street: 70 vehicles (two-way);
- Horton Street: 170 vehicles (two-way);
- Russell Street: 180 vehicles (two-way).

4.1.5. A road typically carries 10% of its traffic flows in the weekday morning and evening peak hours, suggesting that the peak hour volumes on these roads are:

- Burke Street: 5-10 vehicles (two-way);
- George Street: 20-25 vehicles (two-way);
- Frederick Street: 5-10 vehicles (two-way);
- Horton Street: 15-20 vehicles (two-way);
- Russell Street: 15-20 vehicles (two-way).

4.1.6. The Austroads Guide to Traffic Management Part 3 (‘Traffic Studies and Analysis’) sets out thresholds regarding the need for detailed traffic analyses at intersections, and the traffic flows

below which detailed analyses of unsignalised intersections are unnecessary. An extract from this is replicated below.

Major Road Type	Traffic Volumes (Vehicles Per Hour)	
	Major Road	Minor Road
Two lane road	400	250
	500	200
	600	100

Table 1: Extract from Table 6.1 of Austroads Guide to Traffic Management Part 3 (Intersection Volumes below which Capacity Analysis is Unnecessary)

4.1.7. Given that at peak times, Main Road carries slightly over 400 vehicles per hour, and the greatest flow on the minor approaches is 25 vehicles per hour, the traffic flows fall well below the lowest thresholds set out above. Consequently the intersections will operate under 'free flow' conditions, where the ability of a road user to manoeuvre is generally unaffected by the presence of other vehicles.

4.1.8. Nevertheless, for completeness we have modelled the intersection with the highest traffic flows (Main Road / George Street) using the computer software package Sidra Intersection, and the results are summarised below.

Road and Movement		Morning Peak Hour			Evening Peak Hour		
		Avg Delay (secs)	95 %ile Queue (veh)	Level of Service	Avg Delay (secs)	95 %ile Queue (veh)	Level of Service
Main Road (east)	R	6.9	0.0	A	6.9	0.1	A
George Street	L	8.4	0.1	A	8.2	0.0	A
	R	8.9	0.1	A	9.5	0.0	A
Main Road (west)	L	6.4	0.0	A	6.4	0.0	A

Table 2: Peak Hour Levels of Service at the Main Road / George Street Intersection (Without Proposed Retirement Village)

4.1.9. The modelling results reinforce the conclusion that the intersection operates under free flow conditions, as queues and delays are negligible and the levels of service are excellent.

4.2. Non-Car Modes of Travel

4.2.1. As the area is urbanised and is well within a viable walking distance of the town centre, it can be expected that there will be some degree of walking and cycling activity. While the provision of only one footpath is not common in urban areas, the low traffic flows on the roads and low speeds mean that the level of service provided is appropriate. Pedestrians can for the most part walk within the movement lanes without undue risk and the wide grassed verges also provide an opportunity for walking outside the movement lanes.

4.2.2. The NZTA Cycle Network and Route Planning Guide sets out guidance as to when it is appropriate for cyclist to share the road with motorised traffic. For a traffic speed of 50km/h, cyclists can share the movement lanes for volumes of up to 2,000 vehicles per day. All of the Local Roads carry considerably less traffic than this, and therefore the level of provision made is appropriate.

4.2.3. It is anticipated that the size of Pleasant Point (1,428 residents in the 2018 census) is insufficient for a public transport service.

4.3. Road Safety

4.3.1. The NZTA Crash Analysis System has been used to establish the location and nature of the recorded traffic crashes in the vicinity of the site. All reported crashes were identified on Burke Street, Frederick Street, George Street (full length), Russell Street (full length), Horton Street (George Street to Russell Street) and Main Road (100m east of George Street to 100m west of Russell Street). A ten-year period (2015 to 2024, plus the partial year to date), was assessed due to the low traffic flows on the roading network.

4.3.2. The analysis showed that four crashes have been reported:

- One crash occurred when a driver on the northern (cul-de-sac) part of George Street deliberately ran off the road and struck a property fence. The crash did not result in any injuries and the police report notes that this was a 'road rage' incident;
- One crash occurred when an eastbound driver on Main Road collided with a parked vehicle, just east of the Main Road / George Street intersection. The crash did not result in any injuries, and the police report notes that the driver was intoxicated and using his mobile phone;
- One crash occurred on Russell Street just north of Main Road, when a driver attempting to evade police struck two police vehicles and a concrete pillar. The crash resulted in minor injuries;
- One crash occurred on Main Road just east of Russell Street when a westbound driver on Main Riad failed to notice a driver that was slowing to turn into Russell Street, struck the turning vehicle and rolled. The police report notes that the 'at fault' driver may have had a medical event. The crash resulted in minor injuries.

4.3.3. It is considered that the results show that this part of the roading network does not appear to have any underlying road safety issues. The number of crashes is low, and they occurred in different locations and with different contributing factors. Three of the four crashes resulted from unlawful driver behaviour.

5. Proposal

5.1. The proposed retirement village will accommodate all stages of aging. From a transportation perspective, the key facilities and activities proposed are as follows:

- 53 residential villas for independent living;
- 45 beds for residents with dementia;
- Ancillary facilities for residents such as a workshop / men's shed; and
- Ancillary facilities for staff, such as offices, staff room, kitchen, and back of house facilities for administration purposes.

5.2. Because the current proposal is for a rezoning, there is presently no confirmed site plan for the retirement village. However, as part of the rezoning request, an Outline Development Plan (**ODP**) has been prepared as shown below.

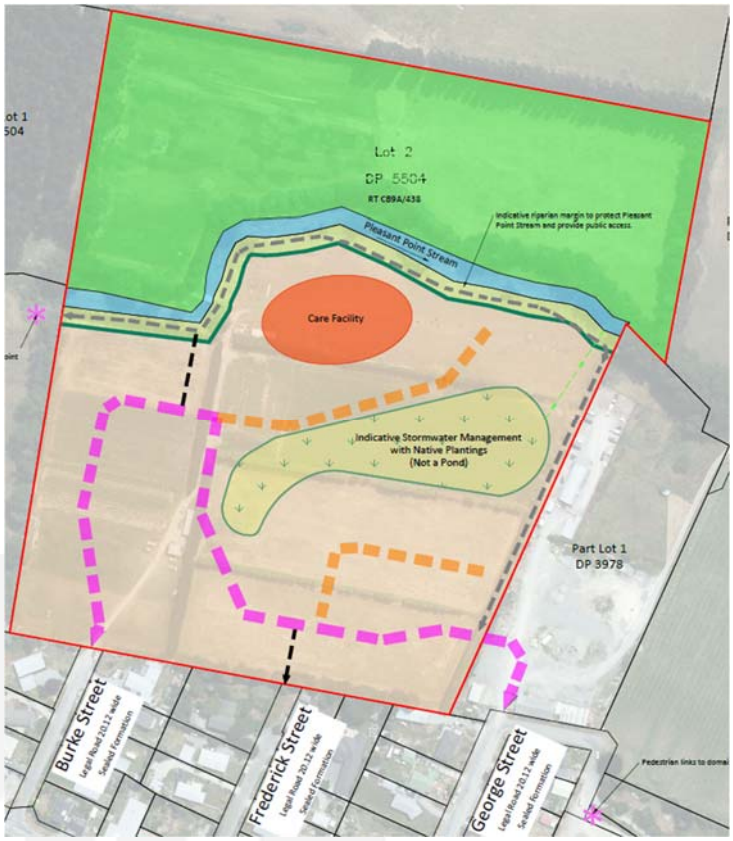


Figure 3: Proposed Outline Development Plan (Extract from David Ogilvie Drawing)

5.3. The ODP shows that the retirement village will have two points of vehicular access, one each onto Burke Street and George Street. These will connect to a small internal roading network which also provide access to parking areas. There is also a non-vehicular access proposed onto Frederick Street.

5.4. To further ensure that the ODP represents a viable solution for the site, Glenhays Investments Limited has also progressed a more detailed design solution. This is in draft form only at present, but is included within this report to show that the ODP can be given effect to.

Figure 4: Indicative Site Layout (Extract from Virginia Barlow Architecture Drawing)

5.5. The dementia care facility is located centrally within the site, with car parking spaces on three sides of this. The layout also shows parking on the internal roads for residents and their visitors. The cul-de-sac portions of the internal roads are terminated with tuning heads.

6. Traffic Generation and Distribution

6.1. Traffic Generation

6.1.1. The traffic generation of retirement villages is lower than for standard residential units because residents have no need to travel for employment or education purposes. Data also shows that a high proportion of residents tend to travel outside of the typical 'commuter' peak hours (again, because they have more discretion over their travel time than if they were required to travel for employment or education).

6.1.2. Consequently, based on the traffic generation characteristics of other retirement villages, it is anticipated that the proposed retirement village will generate the following traffic, which allows for residents travel as well as visitors and staff:

- Independent living villas:
  - 2.6 vehicle movements per unit per day;
  - 0.4 vehicle movements per unit in the peak hour;
- High-care beds
  - 2.5 vehicle movements per bed per day;
  - 0.2 vehicle movements per bed in the peak hour.

6.1.3. The on-site facilities will not be open to the public, and will therefore not generate traffic in their own right.

6.1.4. The traffic generation of the proposed retirement village is therefore as follows:

Type of Unit	No of Units	Trip Rate Per Day		Vehicle Movements (Two-way)	
		Per Day	Commuter Peak Hour	Per Day	Commuter Peak Hour
Independent living	53 villas	2.6 per unit	0.4 per unit	138	21
Care beds	45 beds	2.5 per bed	0.2 per bed	133	11
Total	**-**	**-**	**-**	**271**	**33**

Table 3: Traffic Generation of Proposed Retirement Village

6.1.5. Of these, 85% of vehicles will exit the site in the morning peak hour (with 15% entering), and 65% of vehicles will enter the site in the evening peak hour (with 35% exiting).

6.2. Trip Distribution

6.2.1. With regard to the distribution of these vehicles, it is anticipated that the vast majority will be associated with travel to/from the centre of Pleasant Point, which lies towards the west. There are several routes which could be used for this, but in practice it is likely that drivers will select the route which is fastest and appears to be the most direct, and accordingly, will typically use Main Road due to higher speeds being possible. However there are two route options, using George Street or Burke Street / Russell Street and an assessment has been made of both.

6.2.2. Consequently one scenario is for vehicles to use the Burke Street access. In this case it can be expected that drivers will use Burke Street, a short section of Horton Street, and Russell Street. A second scenario is for drivers to use George Street, in which case they would directly travel to Main Road.

7. Effects on the Transportation Networks

7.1. Changes to the Roading Network

7.1.1. Taking a worst-case outcome of all traffic associated with the proposed retirement village using just one route (rather than being split over several routes as is more likely, as discussed above), this would result in the following increases:

- Assuming all traffic enters/exits using Burke Street:
  - Burke Street:
    - Presently: 5-10 vehicles (two-way);
    - With proposed retirement village: 38-43 vehicles (two-way)
  - Horton Street:
    - Presently: 15-20 vehicles (two-way);
    - With proposed retirement village: 48-53 vehicles (two-way)
  - Russell Street:
    - Presently: 15-20 vehicles (two-way);
    - With proposed retirement village: 48-53 vehicles (two-way)
- Assuming all traffic enters/exits using George Street:
  - George Street:
    - Presently: 20-25 vehicles (two-way);
    - With proposed retirement village: 53-58 vehicles (two-way);

7.1.2. The greatest of these volumes equates to an average of one vehicle movement every minute, which is well within the capacity of the roads.

7.1.3. It can be seen that the greatest increase on any of the road occurs if all vehicles were to use George Street. Consequently the Main Road / George Street intersection has been re-modelled using the Sidra Intersection computer program with the additional traffic arising from the proposed retirement village, and the results are summarised below.

Road and Movement		Morning Peak Hour			Evening Peak Hour		
		Avg Delay (secs)	95 %ile Queue (veh)	Level of Service	Avg Delay (secs)	95 %ile Queue (veh)	Level of Service
Main Road (east)	R	6.9	0.0	A	7.0	0.1	A
George Street	L	8.5	0.2	A	8.3	0.1	A
	R	9.0	0.2	A	9.6	0.1	A
Main Road (west)	L	6.4	0.0	A	6.4	0.0	A

Table 4: Peak Hour Levels of Service at the Main Road / George Street Intersection (With Proposed Retirement Village)

7.1.4. The modelling shows that the performance of the intersection under this worst-case traffic loading is virtually unchanged from the currently performance, with increases in delay of at most 0.1 seconds per vehicle and queues increasing by no more than 0.1 vehicles. These changes will be imperceptible.

7.1.5. If the event that traffic was to use Burke Street / Russell Street instead, or to split between the different routes, then the increase in volumes on each road would be less than has been modelled. Accordingly, the results summarised in Table 4 represent the 'worst case' outcome arising from traffic generated by the proposed retirement village.

7.2. Changes to Non-Car Modes of Travel

7.2.1. The proposed retirement village will generate walking and cycling movements. However these will be modest and the existing footpaths are easily able to accommodate any such increase. No additional infrastructure is required for cyclists under the NZTA guide.

7.2.2. Internally, the indicative site layout shows footpaths on both sides of the access roadway in locations that serve the villas. A connection for non-car travel is also shown towards the northern end of Frederick Street.

7.2.3. The ODP only provides details of the internal site layout. However the indicative site layout includes the provision of a new footpath along Burke Street such that a continuous walking route is provided between the site and the adjacent footpaths.

7.2.4. The increase in population in Pleasant Point associated with the retirement village is not sufficient to justify the provision of a public transport service.

7.3. Changes in Road Safety

7.3.1. The crash history in the vicinity of the site does not indicate that there are any particular features or factors that would be affected by the proposed retirement village. Sightlines at intersections are excellent.

7.3.2. It is noted that the intersections between the Local Roads do not have signage or markings. This is likely to be due to the very low traffic flows, and the high levels of user familiarity with the roads (as the vast majority of road users will be regular travellers on the road). The increase in traffic associated with the proposed retirement village is not sufficient to change any requirement for the intersections to be formally signposted or to have carriageway markings in order for them to continue to operate safely.

7.4. Changes to Roading Widths

7.4.1. The formed widths of the roads have been considered with regard to their current cross-sections and the increase in traffic volumes. The Timaru District Plan (Part D6.6) sets out expected cross-sections for roads, which specify the following:

- Cul-de-sac, less than 100m long and less than 20 household units
    - 14m legal width
    - 1 2.0m berm+footpath width (combined) + 1 3.0m berm+footpath width (combined)
    - 2 2.0m parking lanes
    - 2 2.5m traffic lanes
    - 9m total seal width
- Cul-de-sac, 100m to 300m long or more than 20 household units
    - 16m legal width
    - 2 3.0m berm+footpath width (combined)
    - 2 2.0m parking lanes
    - 2 3.0m traffic lanes
    - 10m total seal width

- Local through road
    - 17m legal width
    - 2 3.0m berm+footpath width (combined)
    - 2 2.0m parking lanes
    - 2 3.5m traffic lanes
    - 11m total seal width

7.4.2. On this basis, none of the Local Roads in the area presently meet the Council's expectations. The seal widths are no greater than 7m, whereas a minimum 9m width is required.

7.4.3. We have considered whether the proposed retirement village causes any of the roads to move from one category to another. In practice, the local through roads remain the same (as they are not dependent on traffic volumes), and only Burke Street and the northern part of George Street would differ. In both cases, they would move from being cul-de-sacs with less than 20 households to cul-de-sacs with more than 20 households. The net effect of this is that:

- A 16m legal width is required rather than 14m
    - Burke Street presently has a 12m legal width
    - George Street presently has a 15m legal width
- The combined berm+footpath width increases by 1m, to 3m required on each side
    - Burke Street presently has 2m on one side over a length of 60m and 3m over a length of 40m, with 3m on the other side
    - George Street presently has 3m on each side
- 2.0m parking lanes are required in each scenario
    - Burke Street does not presently provide parking lanes
    - George Street does not presently provide parking lanes
- 3.0m traffic lanes are required rather than 2.5m traffic lanes
    - Burke Street presently has a 5.7m seal width
    - George Street presently has a 7m seal width

7.4.4. On this basis then, on George Street there is no practical difference that arises due to the increased traffic loading. The legal width, footpath/berm width and traffic lanes all comply with the more onerous classification. The road presently has no parking lanes, even though they are required to meet the District Plan, and this situation would continue into the future. It is not considered that the anticipated increase in traffic would justify widening the seal to provide parking lanes. It is also worth noting that the most recent Standard relating to lane use and subdivision (NZS4404:2010) notes that parking within the movement lanes is an acceptable outcome for roads serving up to 100 residences (far more than would arise in this case).

7.4.5. Burke Street presently has a shortfall in legal width of 2m. If it was to carry more traffic, there would be a shortfall of 1m in the combined berm+footpath width on one side over 60% of its length, and a shortfall of 0.3m in the carriageway width. The road presently has no parking lanes, even though they are required to meet the District Plan, and this situation would continue into the future.

7.4.6. Ultimately the relevant matter is whether the road remains able to accommodate the extent of use by all road users. Even if all traffic associated with the proposal was to use Burke Street then the peak hour traffic flows would increase from 5-10 vehicles (two-way) to 38-43 vehicles (two-way). These volumes remain extremely low, equating to an average frequency of one vehicle movement every 1.4 to 1.6 minutes. The road is only 100m long, meaning that a pedestrian could walk from one end to the other in just over a minute. The potential for one vehicle to meet another, or for a vehicle to meet a pedestrian, is therefore extremely limited under both current and possible future usage.

7.4.7. That said, the absence of a footpath on Burke Street may present practical difficulties for any residents seeking to use a mobility scooter. The lack of a footpath is an existing deficiency on the road (in this regard, it is specifically noted as being a discretionary activity under Part 6.6.3(1) of the District Plan) but nevertheless, the indicative site layout plan provided shows that it is intended to provide a footpath on Burke Street.

8. District Plan Matters

8.1. Introduction

8.1.1. The Timaru District Plan sets out a number of transportation-related requirements with which any development is expected to comply. The proposal is for a rezoning, and at this stage only an indicative site layout has been produced. However in order to identify whether there are any matters which mean that the indicative site layout is not a reasonable representation of the development which could occur, and assessment of the layout against the District Plan provisions has been undertaken and the results are summarised below.

8.2. District Plan Part D6.6: Roading Hierarchy

8.2.1. Matters relating to the widths of the roads have been discussed above.

8.2.2. Within the site itself, in common with other retirement villages it is expected that the roads will remain private (that is, not vested). This ensures that they can be designed and managed to reflect the specific needs of residents.

8.3. District Plan Part D6.7: Vehicle Access and Loading

8.3.1. Part 6.7.2: Rules for Vehicle Access and Loading

8.3.1.1. The plans shown that the parking spaces are 5.0m long, 2.5m wide and have an aisle of 5.5m. The aisle is 3m narrower than the District Plan anticipates, but the extent of parking show is also much greater than the likely demand. Consequently the parking spaces can be proportioned appropriately without giving rise to adverse effects.

8.3.1.2. Four mobility spaces are shown, which exceeds the expected provision under Standard NZS4121:2001 ('*Design for Access and Mobility: Buildings and Associated Facilities'*). The spaces do not meet the appropriate widths for mobility spaces as they are 3.2m wide rather than 3.5m wide, but again there is ample space within the site for these to be widened.

8.3.1.3. The routes to and from the spaces are unobstructed and it is not anticipated that any difficulties will be encountered in manoeuvring to and from the spaces. All spaces are provided on the site itself.

8.3.1.4. Two loading spaces are shown within the site. Service vehicles are infrequent at retirement villages, but it is common that a loading bay is provided for food deliveries, refuse removal and for laundry. The plans show that the spaces could also be used by ambulances. The spaces are 6m wide and 14m long, which is ample for the size of the vehicle that would likely to be present and in practice the size of these areas could be reduced.

8.3.1.5. There are no reasons why the spaces cannot be formed and marked (although it is noted that this provision does not apply to Pleasant Point) and the layout means that the spaces will be kept clear and not used for any other purpose.

8.3.1.6. The site is relatively flat and in most cases it is expected that the parking spaces and manoeuvring areas will; be provided on engineered ground, meaning that the required gradients can be achieved.

8.3.1.7. Kerbing can be provided to delineate the parking spaces, and access is only achieved from Local Roads meaning requirements for reversing do not apply.

8.3.2. Part 6.7.3: Performance Standards for All Zones Except Rural Zones and Recreation 1 and 3 Zones

8.3.2.1. It is noted that the site is zoned as rural, but the particular activity proposed is residential and therefore it is appropriate to assess the provisions for urban development.

8.3.2.2. Sufficient space is provided within the site so that no vehicle is required to reverse to or from it. Accesses to the site can be formed, drained and sealed as required, and the minimum widths for access are achieved. As noted above, appropriate gradients can be achieved.

8.3.2.3. Vehicle crossings are located at least 100m from intersections.

8.4. Summary of District Plan Compliance

8.4.1. On the basis of this assessment, it is considered that the indicative site plan is able to comply with the District Plan transportation provisions, although minor adjustments are required to the layout. This being the case, it is considered that the ODP represents a viable and realistic overarching layout for the site.

8.5. Parking Demand

8.5.1. Although this matter is no longer included within the District Plan, an assessment has been undertaken of the likely parking requirements at the site.

8.5.1.1. According to the Household Travel Survey, 73% of New Zealanders aged 75 and over have a driving license. However since there is typically no need to travel for employment purposes, the majority of older households have just one vehicle. Thus a rate of 1 parking space per independent living unit is appropriate.

8.5.1.2. Visitors to the independent living units will require additional parking. While a surveyed rate is generally not available, a rate of 1 space per 5 units is set out in the NSW RTA Guide, but it appears unlikely that 20% of all residents will have visitors at the same time. According, a parking ratio of 1 space per 7 units has been adopted, noting that this is still likely to be conservatively high.

8.5.1.3. For high-care beds, a rate of 1 parking space per 5 beds is included in the NSW RTA Guide, which is also aligned with surveys of such facilities. Since these residents do not drive, this parking ratio covers visitor parking only.

8.5.1.4. Finally, staffing of retirement villages typically depends on the type of care given (independent living, serviced apartments or high-care beds), and a parking rate of 1 space per 2 members of staff is often adopted. This is difficult to forecast in advance as staff levels of commonly not known, but in practice, staff parking is typically no more than 20% of the parking provided for other users.

8.5.2. This then suggests the following parking is required to meet demand:

- Independent living units (villas) residents:
  - 1 space per unit
  - 53 units therefore 53 parking spaces

- Care beds:
  - 1 space per 5 beds
  - 45 beds therefore 9 parking spaces
- Staff:
  - 20% of parking required for other uses
  - 62 spaces required, therefore 12 spaces

8.5.3. Overall, 74 parking spaces is anticipated to meet demand, and the inductive site plan shows that the number of parking spaces proposed is in excess of this. As set out above, it is likely that the drawings will need to be updated to ensure that appropriate dimensions for the parking spaces are achieved, but even within this amendment, ample car parking will be available.

9. Conclusions

9.1. This report has identified, evaluated and assessed the various transport and access elements of a proposed retirement village development at Pleasant Point.

9.2. Overall it is considered that the traffic generated by the proposed retirement village can be accommodated on the adjacent roading network without capacity or efficiency issues arising. The difference in the delays per vehicle between a scenario with and without the proposed retirement village is negligible and will be imperceptible.

9.3. The roads around the site already appropriately provide for walking and cycling movements, and it is not required that any additional infrastructure for pedestrians or cyclists is required. However to ensure a continuous walking route is provided for residents, the indicative site plan shows that a footpath is to be provided on Burke Street, between the site and Horton Street.

9.4. It is not expected that there will be any adverse safety effects from the proposal, with the prevailing crash records not indicating any existing issues in the immediate area.

9.5. An assessment has been carried out as to whether the traffic increase justifies any improvements to the roads around the site. Most are already classified as local through roads and this remains the case if the proposed retirement village was to be consented. The two roads that serve the site, Burke Street and George Street, have been specifically considered and it is noted that they currently fall below the expected layouts of the District Plan. Having considered the effects of the traffic generated by the proposed retirement village, it is not considered that improvements are justified in order to mitigate adverse effects. That said, the existing deficiency of the lack of footpath on Burke Street may present practical issues for residents wishing to use a mobility scooter, which is why the proposal includes for the provision of this.

9.6. The site complies (or is capable of complying through the detailed design process) with the provisions of the District Plan. The plans show that the site has sufficient area to amply provide for its own parking needs.

9.7. Overall, and subject to the preceding comments, the proposed retirement village is not anticipated to give rise to adverse road safety of roading efficiency outcomes. Accordingly, the use of the site for this purpose can therefore be supported from a traffic and transportation perspective, and it is considered that there are no traffic and transportation reasons why the site should not be rezoned for this activity.

Carriageway Consulting Limited
June 2025

Appendix A

Qualifications and Experience of Report Author

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Qualifications and Experience

Report Author: Andy Carr

Professional Qualifications

1988	Batchelor of Science with Honours (Computing Science), University of Newcastle upon Tyne
1989	Master of Science (Transport Engineering and Operations), University of Newcastle upon Tyne
1998	Master of Business Administration (Distinction): University of Newcastle upon Tyne
2006 - present	Chartered Professional Engineer (Practice field: Transportation engineering)
2006 - present	International Professional Engineer (NZ)
2006 - present	APEC Engineer
2006 - present	Chartered Member, Engineering New Zealand

Employment Profile

2014 - present	Director, Carriageway Consulting Limited - involved in numerous transportation engineering projects from transportation assessments for new developments and plan changes, to roading design, road safety audits, and independent peer reviews for local authorities and government departments.
2012 - 2014	Associate Principal, Abley Limited - leading a range of transportation assessments for land-use projects throughout the country;
2005 - 2012	Senior Transport Planner and progressing to Senior Associate / Office Manager, Traffic Design Group - responsible for sourcing, managing and overall technical direction of the transportation assessments for land use development projects throughout the South Island.
2004 - 2005	Senior Transport Planner, Beca - assisting in a variety of roading projects with particular responsibility for writing the first New Zealand Pedestrian Planning Guide.
1990 - 2004	Traffic engineer in various private sector roles in the UK, ranging from Graduate (1990-1992) to Principal (2000-2004) with a range of roles, initially assisting with a variety of projects assessing land use changes, road safety and strategic transportation studies, and ultimately managing a local team with technical oversight of all work carried out, client liaison and sourcing commissions.

Additional Information

Member, Resource Management Law Association

Associate Member, New Zealand Planning Institute

‘Making Good Decisions’ commissioner course (‘excellent’ grade)

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APPENDIX F

ECAN Feedback

Lauren Roycroft

From: Oliver Hermans <Oliver.Hermans@ecan.govt.nz>
Sent: Tuesday, 13 February 2024 9:11 am
To: Lauren Roycroft
Subject: [#DOA 30661] 24017, 10 Burke Street, Pleasant Point - Design Comments
Attachments: FW: [#DOA 30661] Any further points to note? ECAN 10 Burke St

Hi Lauren,

Please see below for some general comments and a response to the queries you raised in your email.

General Comments around the site and flooding

- Generally the proposed design looks to align with the areas of high ground that we (Environment Canterbury) identified as suitable for development in 2022.
- It is worth keeping in mind that increased development in this area will lead to increased runoff in storm and river flooding events, due to a reduction in permeable surface areas. A development of this size (50 plus lots) would have a reasonably significant impact on this, even without accounting for residential development on other properties. To a degree we account for this development in our depth estimates, but there is always a degree of variability, which the developer should keep in mind, especially for a site that will host vulnerable residents. To that end modelling of the impact of the development on flooding in the area is something that should be considered.
- Egress to the rear lots is also something that should be considered. In a major event it is quite possible for the stream to become impassable. This should be considered during the development phase. The bridge also represents a potential weak point and consideration of the potential for debris build up and potential water breakouts at this location are worth considering.
- Generally I don't see any significant issues with the design at this stage, low ground appears to have been avoided which aligns with the comments that were made in Assessment 22104 and I still consider those comments to be relevant. Namely that residential development will require elevation of the floor levels of any dwelling, though the degree of this will vary across the site and be reliant, to some degree on what ground levels on the site look like following development.

Specific Points

- The attached (DRAFT) Development plan is simply a compilation of all information known to date from the design architect, ECan, LINZ etc.
- We have discussed the option of removing Villa's 14-17 immediately adjacent of the Pleasant Point Stream and would like ECan's thoughts on the requirement for this.

In terms of avoidance of flood risk this is a good idea. Depending on how well incised the stream ends up being following development of the site, it may be that the ground levels are high enough that any dwellings are unlikely to be threatened, though the bridge will always represent a risk and potential source of flood risk. Certainly our modelling indicates that depths in this area will be around 700 mm and this should be kept in mind.

- In regards to the existing FHA - are you able to quantify/refine what is considered to be "Deep Flooding" as shown on page 6?

Roughly speaking these areas encompass low lying areas where modelled flood depths will be at least 800 mm or greater. Again when accounting for climate change and increased development, these estimates are likely to be fairly optimistic and flood waters are likely to exceed this in a 200-year ARI flood and greater.

- Please confirm all identified "deep flooding" areas will meet ECan's consideration of "High hazard"

It is likely that these areas will meet the definition, though confirmation will need to wait until ground levels and the final layout are confirmed which may influence things.

- Our client has asked for some resilience to be built into any flood modelling to allow for any gravel built up in the river bed (~ 100mm proposed) and to protect the vulnerable population within the lifestyle village/retirement village/potential for a residential care facility. We understand this was requested in the initial FHA as well.

Yes, this was discussed with the client in the initial discussions. The model assumes a relatively high bed-level at the key reach of the river where breakouts would have the greatest impact on Pleasant Point. This conservatism is built into the model already. Further the model is relatively conservative in estimating breakout flows, climate change, river bank breach size ect. Essentially it assumes the most conservative (though still realistic) conditions.

- An option to remove the proposed grey-water recovery system is being considered – this may become a stormwater management area instead.
- Where possible, Stormwater and the proposed Wetland are to follow the natural contour of the land.
- It is anticipated that there will be a permanent pond aspect for resident amenity, this is likely to be lined and pumped to keep water circulating and healthy.
- Proposed Overland flow path to Pleasant Point Stream.

As a general comment, development options for the lower lying land will be limited due to the likely high hazard status of much of it. Using these areas for water management seems appropriate.

- *As an aside, we note the adjacent site to the west is subject to a proposed subdivision for residential activity. See CRC240809, CRC240809 and CRC240811.*

Generally, outside of the low lying land, development in this area is possible. Though depending on the location elevation of the floor levels, possibly significant may be required to meet the TDC standard. However I note that TDC is the authority when considering residential development and ultimately it is their decision whether development is appropriate and building consent is granted.

When using the flood information provided it is important the following points are understood:

- The information provided is the best information Environment Canterbury has at this time. The District Council or local residents may have further information about flooding at the property.
- Environment Canterbury's understanding of flooding at the property may change in the future as further investigations are carried out and new information becomes available.
- It is assumed that flood protection works will be maintained to at least their current standard in the future.
- Flooding can occur in smaller floods if stopbanks are breached at lower than design flows. A breach can occur through lateral or internal erosion of the stopbank. The location of a stopbank breach or overtopping may affect flood depths at the property.
- Flood flow paths and depths can be affected by changes on the floodplain such as:
    - Altering swales, roads or irrigation features
    - Property development including buildings, fencing and hedges
    - Blockages in culverts, drains and bridges
    - Seasonal vegetation growth
    - Antecedent soil moisture conditions

The prediction of flood depths requires many assumptions and is not an exact science.

I hope this information is of assistance. Please do not hesitate to contact me if you require any clarification.

Yours sincerely,

Oliver

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Scientist

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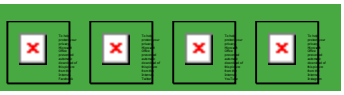

Lauren Roycroft

From: Tim <tim@southanjer.co.nz>
Sent: Wednesday, 21 June 2023 12:57 pm
To: Lauren Roycroft; Glen McLachlan
Subject: [#DOA 30661] Fwd: 22104, 10 Burke Street, Purchase, Letter and Attachments
Attachments: 22104, 10 Burke Street, Purchase, Letter and Attachments - Public Record.pdf

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From: Oliver Hermans <Oliver.Hermans@ecan.govt.nz>
Sent: Friday, May 13, 2022, 4:27 PM
To: Tim <tim@southanjer.co.nz>
Subject: 22104, 10 Burke Street, Purchase, Letter and Attachments

Hi Tim,

See attached for the assessment for 10 Burke Street. In terms of planning I think the required floor levels would be able to be achieved either by raising the finished floor levels of the buildings or through building the ground level up. Though if that is the path chosen then care would need to be taken not to lift up too much and disrupt the flow of water through the property.

Feel free to give me a bell on Monday if you want to discuss anything, otherwise have a good weekend and hopefully this is what you were after.

Regards,

Oliver

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