

Timaru District Council
Timaru District 2045
Draft Growth Management Strategy

Consultation Summary and Officer Recommendations
For Hearings Panel Review and Recommendations to Council

November 2017

EXECUTIVE SUMMARY

Introduction

The Draft Timaru Growth Management Strategy (**DGMS**) sets out the framework for managing growth and resource management within the district for the next 30 years. It is a non-statutory document.

The DGMS establishes a vision, strategic directions and secondary directions for achieving growth, integration of land use and infrastructure, and the management of natural and physical resources in a manner that achieves the purpose and mandate of the Timaru District Council under its respective statutory duties.

The GMS will direct the Council's infrastructure, services, and land-use planning. The process for implementation will be a combination of measures under both the Resource Management Act (1991) and the Local Government Act (2002).

Consultation and Process

Consultation with stakeholders has been ongoing since July 2015, with feedback sought on an initial 'Issues and Options' paper.

In the preparation of specific growth options, the Council collaborated with external agencies such as Alpine Energy, Environment Canterbury and Community and Public Health.

Prior to publication of the DGMS, a preliminary version was provided to relevant agencies and strategic infrastructure providers for comment. These Agencies supported the Council's approach, albeit with modest modifications, particularly the approach of a 30-year Strategic Plan linking land use and Infrastructure

The DGMS was approved by Council for public consultation on 1 April 2017. Public consultation included a number of drop-in sessions as well as notification in the Timaru Herald and on the Council Website.

Submissions officially closed on 12 May 2017. A total of 75 submissions were received, inclusive of three late submissions, and one received from Aoraki Environmental Consultancy Limited on behalf of Te Rūnanga o Arowhenua.

Figure 1: Origin of Submissions

Submitter	Submissions
Individuals (e.g. C Wright, F Ross)	59
Business Associations / Community groups (e.g. Levels Golf, Civic Trust)	8
Government Agencies (e.g. CRC)	3
Strategic Infrastructure (e.g. NZTA)	3
Agencies (e.g. Heritage NZ)	1
Iwi (Arowhenua)	1

Feedback themes

The major themes that have emerged from the consultation process are:

- Need for additional business zoned areas (industrial and commerce).
- Whether growth predictions are too conservative, and insufficient rural residential land has been provided.
- Support of the focused approach to rural residential development in the District.
- Provision of infrastructure to service development, particularly rural residential zones.
- Cost recovery for infrastructure provision.
- Recognition and provision for natural areas and significant landscapes.
- The approach associated with resilience and natural hazards, i.e. sea level rise implications for Washdyke.

The aim of this report is to provide a summary of submissions received during public consultation and provide broad level responses and recommendations.

Updated Growth Projections (NZS 2017 Update)

The DGMS was published shortly after the National Policy Statement – Urban Development Capacity (**NPS-UDC**) was gazetted which seeks to ensure that sufficient development capacity is provided in urban environments.

The NPS-UDC provides a base requirement to use Statistics New Zealand Medium Series projections for growth profiles.

Furthermore, Statistics New Zealand updated its population and household projections (**NZS 2017 Update**) in early 2017. It is incumbent on Timaru District Council to use those projections to identify the short, medium and long-term growth demands accordingly.

To assist, Property Economics (**Attachment A**) have provided the most up to date population and household figures based on the NZS 2017 update at the District and settlement level. Property Economics have also identified the resultant changes in terms of the growth in employment count (**ECs**) for industry and retail sectors, and advised on land demands. That information has informed the recommendations included in this report.

The amended growth projections remain modest, and do not result in any material changes to the growth areas identified in the DGMS.

The Hearing

On 6 to 8 December 2017, a Panel consisting of Independent Commissioner Bill Wasley and three Councillors (**the Hearings Panel**) will listen to those parties that have advised that they wish to speak to their submissions.

A copy of this report will be pre-circulated to both the Commissioner and submitters prior to the Hearing.

Recommendations contained within this report are not binding on the Hearings Panel who will also have the benefit of hearing material presented by submitters.

The Hearings Panel will consider all submissions (heard and unheard) and the staff responses, before directing what changes should be made to the Growth Management Strategy to then be **recommended** to be adopted by the Council.

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Part A – Overview and Introduction

1.0 Introduction

1.1 Process and Purpose of this Report

1.1.1 Aim of Report

This report seeks to summarise feedback received from public consultation on the DGMS.

The Hearings Panel is then provided with a summary of that feedback, additional information and an Officer recommendation to support their consideration of that feedback. The Officer response is commensurate to the issue considered.

Attachment B provides a recommendation for each submission point.

Attachment C identifies recommended changes to the DGMS text and the relevant submission relied on.

1.1.2 Hearing Process

Figure 1 summarises the Hearings Panel process.

From the 6th to 9th December 2017, a Hearing convened by Independent Hearings Commissioner and three Councillors (**the Hearings Panel**) will listen to those submitters who indicated their wish to be heard.

The Hearings Panel are not bound to any recommendations made by Council Officers.

The Hearings Panel will consider all feedback (heard and unheard), and the staff responses, before directing what changes should be made to the DGMS. Council staff will make changes to the DGMS in accordance with the Commissioner directions.

The final DGMS will be presented to the Council for adoption as the Growth Management Strategy.

1.1.3 Background

In October 2014 Council resolved that a Growth Management Strategy (**GMS**) be prepared for the district.

The purpose of the **GMS** is to provide an overarching framework for managing growth; and inform land-use zoning and integrate land-use planning and infrastructure provision, including the staging and allocation of infrastructure expenditure.

The **GMS** is to confront and provide a strategic management response a number of key challenges facing the district over the next 30 years. Those challenges include:

- Modest household growth projections and an increase in older population cohorts;
- A history of incremental and unconsolidated rural residential development.

- The need to provide an integrated approach to infrastructure provision and sustainable land supply.

The GMS is a non-statutory document, but will inform Local Government Act (2002) Council documents such as Activity Management Plans, and the strategic priorities of the Long-Term Plan.

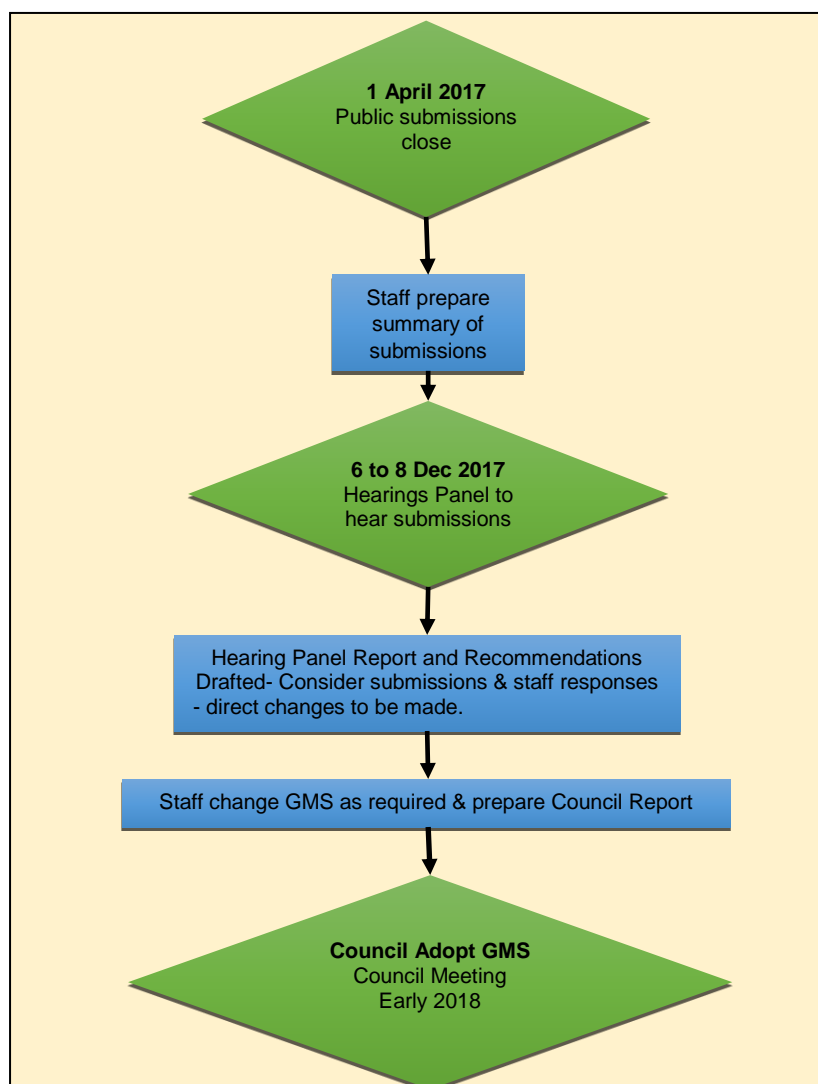
The GMS will also inform the preparation of the replacement Timaru District Plan under the Council's Resource Management Act 1991 functions. That replacement District Plan is to implement ('give effect' to) the relevant requirements of the Canterbury Regional Policy Statement (2013).

A series of background reports identified the key issues/constraints to urban growth in the area, and informed the development of the DGMS. In addition, the DGMS has been informed by:

- The Canterbury Regional Policy Statement and the principles of relevance in the Mahaanui Iwi Management Plan (2013).
- Council strategic planning and policy, including the Long-term Plan, Infrastructure Strategy, Timaru District Plan and Parks Strategy.

The DGMS proposes a vision, strategic directions (goals) and directions (policies) for Timaru District.

Figure 2: Hearing Panel Process



1.1.4 Consultation Process

The Timaru District Council (**the Council**) is not required to undertake the special consultative procedure outlined in Section 83 of the Local Government Act 2002 (LGA 2002). However, the Council has consulted extensively with stakeholders in accordance with the principles of consultation as set out in Section 82 of the LGA (2002).

The preparation of the DGMS has been punctuated with milestones involving discussions with the community and stakeholders. That dialogue has shaped the final DGMS.

Specific targeted consultation has been undertaken as associated with:

DGMS Stage	Groups Consulted
Issues and Options Paper (July 2015)	Released for public feedback (two-week response phase)
Criteria and evaluative approach: <ul style="list-style-type: none"> • Growth Options Report (March 2016) • Growth Assumptions Report (February 2016) 	Agencies (i.e. Canterbury Regional Council, Transpower, Alpine Energy).
Preliminary DMGS	Canterbury Regional Council; Aoraki Development; KiwiRail; NZTA; Transpower, Alpine Energy; the South Canterbury Chamber of Commerce; and Federated Farmers.
Draft Growth Management Strategy & Summary and consultation document	Public and Agencies, including 'drop-in' sessions

Full public consultation of the DGMS commenced on 1 April 2017 by way of public notices in the Timaru Herald, Timaru Courier and Council website. Submissions closed on 12 May 2017, although extensions were granted for a number of parties. In total 75 submissions were received.

Drop in sessions were also held during the submission phase as follows:

- **Geraldine.** Monday, 1 May 2017 - 5pm to 7.30pm. Geraldine Library Service Centre
- **Timaru.** Thursday, 4 May 2017 - 11am to 1.30pm and 5pm to 7.30pm. Timaru District Council

Submissions could be made through the Council web page, via email or in hard copy. Two documents were prepared for public consultation: the DGMS, and a Summary (14 pages).

1.1.5 Consultation and Submission: Takata Whenua (Te Rūnanga o Arowhenua)

Representatives of Te Rūnanga o Arowhenua were invited on numerous occasions for discussions and their input into the preparation and draft GMS, including at meetings established for the district plan review.

In the absence of targeted involvement by Te Rūnanga o Arowhenua, principles raised in the Mahaanui Iwi Management Plan (2013)¹ and Takata Whenua Discussion Document² were utilised to identify issues and formulate strategic directions associated with takata whenua.

Submission number 75 (**Sub 75**) is from Te Rūnanga o Arowhenua C/- Aoraki Environmental Consultancy Limited. The submission relates to three matters, being:

- Sub 74.1 incorporating reference to the *Iwi Management Plan of Kati Huirapa for the Area Rakaia to Waitaki* (1992) in Section B:1 of the DGMS;
- Sub 74.2 relating to including specific reference to Te Rūnanga o Arowhenua as the appropriate papatipu rūnanga in Section D:1; and
- Sub 74.3 Insert at A2.1 and A2.4 Support Agency: Te Rūnanga o Arowhenua

Those matters are considered in Section 11.3.1 of this report. Te Rūnanga o Arowhenua will be represented at the Hearing by Ms Kylie Hall who compiled the submission from Aoraki Environmental Consultancy Limited.

1.2 Thematic Summary of Submissions

1.2.1 The Survey

The questionnaire accompanying the summary DGMS and provided on the Council website was filled out by 33 of the 75 submitters.

The remaining submissions provided a general response, or narrowed to a site-specific rezoning request. The following section of this report is to be interpreted based on analysing **only** the 33 submissions that responded to the structured feedback.

The survey was split into three categories:

Section A – Settlement Areas. This invited feedback on the settlement patterns associated with the main urban areas of Timaru, Geraldine, Pleasant Point and Temuka, as outlined in Section A2.4 of the DGMS (Figures 2 to 5). The approach to Rural Residential development in the district was also framed as a specific question given the change in direction for the previous land management approach in the District Plan. Specifically, respondents were asked on a scale of 1 – 5 whether they strongly agreed, were neutral, or strongly disagreed with the approach. Comments were also sought.

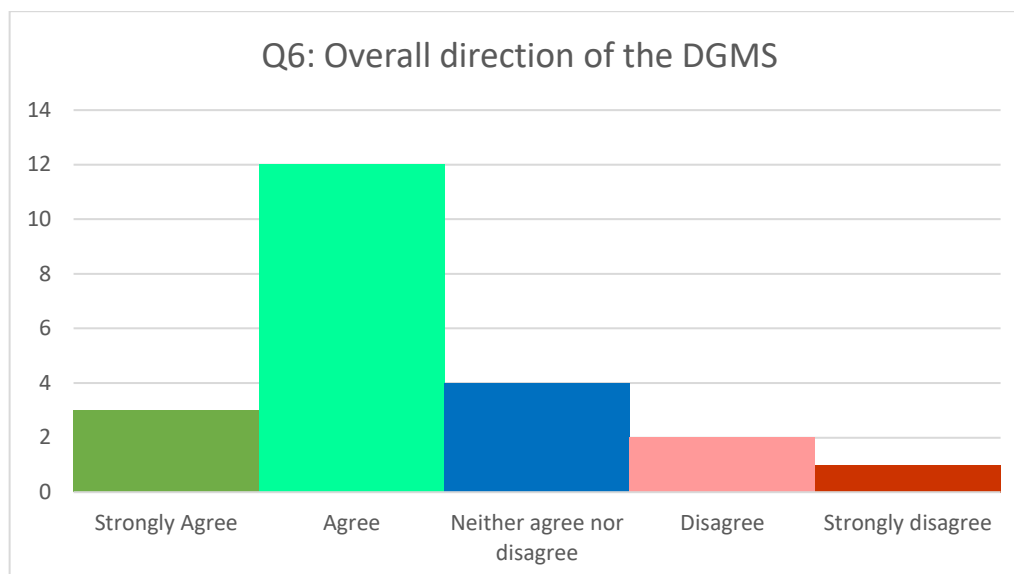
Section B – Strategic Directions. Sought to elicit responses to the 12 Strategic Directions outlined in Section A2.3 of the DGMS. As above respondents were provided with a scale of responses and the ability to comment on specifics. In addition, two specific matters where comments were sought were:

Question 6 – Overall how much do you agree or disagree with the overall direction of the Draft Growth Management Strategy (**refer** Figure 3). Of the 22 parties that responded, overwhelmingly the DGMS approach was supported.

¹ <http://www.mkt.co.nz/iwi-management-plan/>

² Timaru District Council. Takata Whenua Discussion Document, December 2016.

Figure 3 : Overall Direction



Question 8 – The DGMS identifies three key challenges (page 21), being:

- (1) Managing the challenges associated with a modest level of forecast population growth and an increase in the elderly population;*
- (2) The Council discharging its legal responsibilities under the Resource Management Act (1991) and the Local Government Act (2002);*
- (3) A community expectation that the Council takes an active role in integrating and managing growth, including that the costs of growth are to be fairly distributed, and do not fall predominantly on the wider existing community.*

Of the 17 parties that responded, those challenges were agreed with, with only three parties disagreeing (**Figure 4**).

The direction of these responses is important, as it illustrates that of these respondents (the 33 that completed the survey forms) there was agreement that the DGMS had correctly identified the key challenges confronting the Timaru district, and had provided an appropriate strategic direction to respond to those challenges. Of the remaining submissions, it is noted that only a limited number did not support the direction of the DGMS. This should not discount from specific matters raised in opposition.

Section C – Additional Comments, provided an opportunity for more detailed responses. These largely related to specific rezoning requests.

1.2.2 Settlement Approaches

The main findings from the responses on each settlement is that more responses agreed, rather than disagreed with the approach taken. The low sample size should be acknowledged.

The responses to the Rural Residential approach are heavily in support of the targeted and zoned approach. This is important, as the DGMS approach of a targeted and zoned response to Rural Residential opportunities in the district represents a significant departure from the operative District Plan's exemptions approach. It should be noted that submissions seeking additional rural residential opportunities form the majority of submissions received.

Figure 4 : Growth Challenges

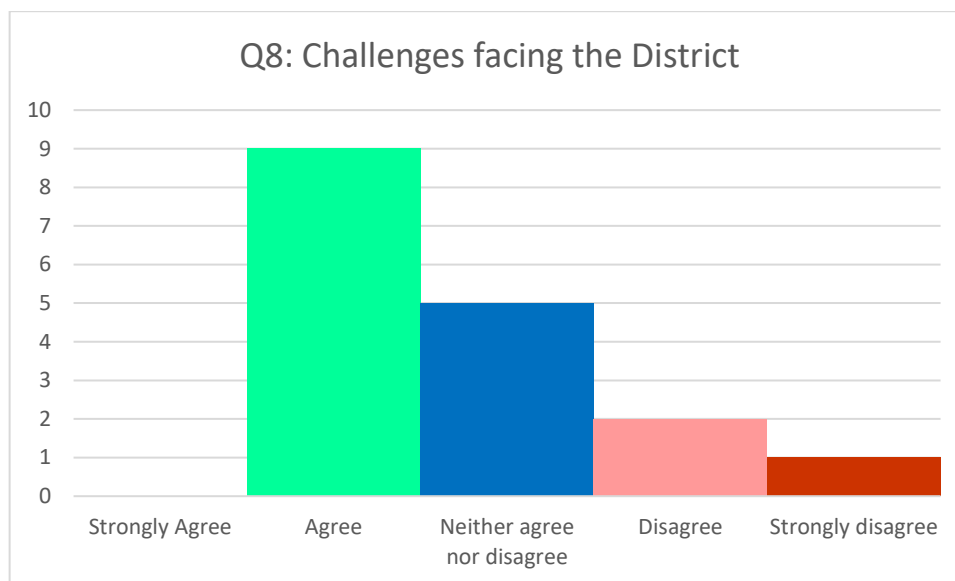
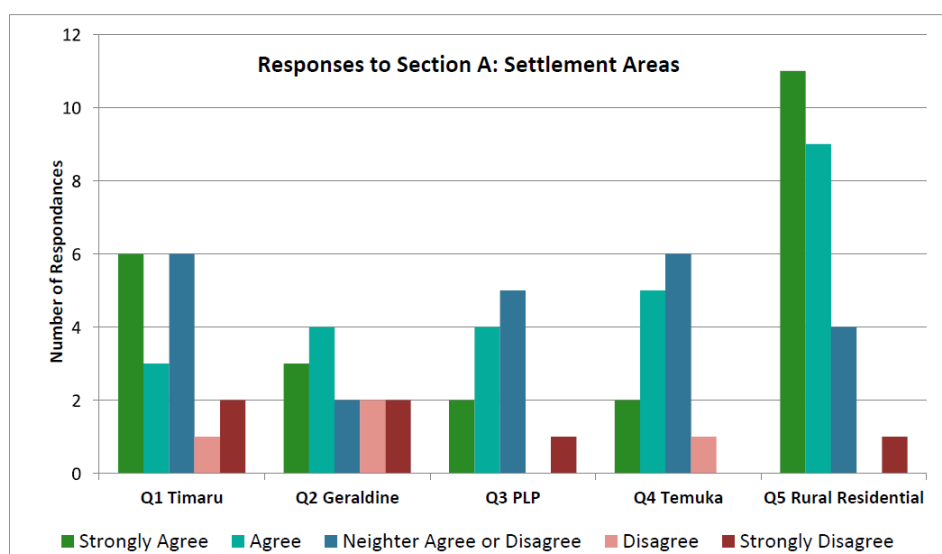


Figure 5: Responses to Settlement Areas



1.2.3 Major Themes

Some major themes have emerged from the consultation process:

- General support for the approach as to the provision of a range of housing types and managed consolidation.
- The implications of modest growth projections and changing (aging) demographics.
- Support for consolidating commercial centres.
- Support for the zoned provision of rural residential development in the District, albeit with many parties seeking a rural residential rezoning (some 350ha in addition).

- Whether the growth predictions applied to the GMS are too conservative, and insufficient zoned land has been provided, particularly zoned rural residential opportunities at Timaru.
- Whether the business approach is too restrictive and opportunities for growth and employment will be lost.
- Council should provide water and sewer connections for rural residential zones.
- Support for the integration of land use with transport choices is supported.
- Heritage should be retained and restored as much as possible, including Timaru settlements CBD heritage buildings.
- Whether the DGMS appropriately deal with resilience and natural hazards, i.e. Sea level rise implications for Washdyke.

1.3 Reporting Officer and Approach to Submissions

1.3.1 Author

My full name is Matthew William Bonis (Matt Bonis).

I am an Associate Planner of a Town Planning consultancy based in Christchurch, with a Bachelor of Resource and Environmental Planning Degree with Honours from Massey University. I am a Member of the NZ Planning Institute, and also a Ministry for the Environment Accredited Resource Management Act Commissioner (qualified 2009).

I have been employed in the practice of planning and resource management for 22 years both in New Zealand and the UK. During this time, I have been involved in a number of land use and infrastructural projects, including the following:

- Infrastructure projects (AMI Stadium Christchurch, TrustPower, Lyttelton Port Company, Christchurch International Airport Ltd);
- Drafting Planning documents, including the Change 6 Auckland Regional Council and Subsequent Auckland Unitary Plan – Business zone provisions, Author of Chapter 5 to the Canterbury Regional Policy Statement (2013) and consideration of numerous Plan Changes for District Councils, including Christchurch City, Taupo District, and Selwyn District.
- Structure Plans and Strategies, including being lead planner on the Belfast Area Plan, Christchurch.

Importantly, I assisted the Timaru District Council in drafting the DGMS.

I have resided in Christchurch for 20 years, and have visited Canterbury extensively, as well as undertaking Planning work in Mackenzie District, Ashburton District, Selwyn District, Christchurch City and Waimakariri District.

For the avoidance of doubt, I have read the Environment Court's Code of Conduct for Expert Witnesses, and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

I have undertaken extensive site visits of the District and its urban areas in the preparation of the DGMS.

On **23 July** 2017, I visited every site-specific submission for Geraldine, on **15 August** 2017, I visited all remaining sites.

I am reliant on the material and evidence provided by:

- Property Economics – Growth Projections, Retail and Industrial demand;
- TDC - Timaru District Industrial Land Supply and register;
- TDC – Timaru District Residential Land Supply and register;
- The Council’s Infrastructure Team (Frazer Munro – Consideration of Infrastructure demands for site specific rezoning); and
- The provisions of the Canterbury Regional Policy Statement (2013) in terms of recommendations for site specific submissions.

1.3.2 Content

The nature and circumstances of this Report are not stipulated in the Local Government Act 2002.

This report seeks to set out the submission relief, relevant main principles and provide a recommendation based on the information available to the Author. This report sets out an analysis of the main themes raised in submissions. **Attachment B** sets out the accompanying analysis for each submission point.

1.3.3 Explanation of terms and coding used in the report

The Council – Timaru District Council

CRPS – Canterbury Regional Policy Statement (2013)

DGMS – Draft Growth Management Strategy

LGA2002 – The Local Government Act 2002.

Long Term – Thirty years (in the **Updated Projections** the year 2048)

Medium Term – Ten years (in the **Updated Projections** the year 2028)

NPS-UDC – National Policy Statement on Urban Development Capacity (2016)

NZS 2015 – New Zealand Statistics 2015 Medium Series Projections (also the ‘**DGMS Projections**’), off a 2013 base.

NZS 2017 – New Zealand Statistics 2017 Medium Series Projections (also the ‘**Updated Projections**’), off a 2013 base.

NZTA – New Zealand Transport Agency

RMA1991 – The Resource Management Act 1991

Short Term – Three years (in the **Updated Projections** the year 2021)

1.3.4 Legislative mandate specific to the DGMS

The legislative mandate for the DGMS is set out at Section C:2.4 of the document. As stated:

“This strategy is a non-statutory document that will be principally used to inform the management of land use growth, primarily through implementation in the District Plan”.

Accordingly, the DGMS occupies a platform where it is to assist the Council in achieving its role under:

- (i) **The LGA2002** purpose for local government, including: decision making on behalf of its communities; provision of infrastructure; and prudent financial decision making.;
- (ii) **The RMA1991** which directs the sustainable management of natural and physical resources. The land use outcomes of the GMS are to be implemented by the District Plan review (commenced 2016). The District Plan outcomes are governed by the Council’s functions under s31 of that Act, and sections 74 to 77 which relates to matters to be considered and the contents of district plans. Section 75(3) requires land use outcomes in the District Plan that:

“S75(3) ... must give effect to –
(c) any regional policy statement”.
- (iii) The Land Transport Management Act 2003 which governs the way in which New Zealand’s land transport system is developed, managed and funded.

The role of the DGMS is to provide an agreed macro level strategy for the management of land use growth in the District. It should not put forward approaches that would not achieve, or give effect, to the established regional frameworks established in the CRPS.

The DGMS does not address micro level issues associated with specific neighbourhood servicing and transport issues. An example being Sub No. 7.4 seeking:

“Would like to see the 50kph zone increased on Pages Road, Timaru from 254 Pages Road through to 377-383 Pages Road due to the danger of a pending accident”.

1.3.5 Growth Projections, and the Council’s Statutory responsibilities, including RMA Amendments to s31 (19 April 2017)

New Zealand Statistics Medium Growth Projections

A number of submissions seeking site specific urban or rural residential rezoning’s state that the Growth Projections used for the DGMS are conservative or artificially low (e.g. refer Sub 65.2).

Two alternatives are suggested, utilisation of ‘an ambitious growth plan’ (e.g. refer Sub 46.2) or linear projection of building consent figures particularly for rural residential development (e.g. refer Sub 43.2).

The DGMS has utilised as it base the New Zealand Statistics Medium Growth Projections.

Mr Heath (**Attachment A**) has identified the importance of the use of the Medium Growth New Zealand Statistics Projections:

“Property Economics have utilised the SNZ Medium Series projections as this is the base requirement in the National Policy Statement on Urban Development Capacity. SNZ projections are generated from significant data inputs and dynamic variables monitored by SNZ. SNZ projections are also viewed as independent and credible and form part of their statutory obligations. They also represent the base projection series utilised in Environment Court with any deviation from SNZ projections having to be very well justified.”³

Mr Heath has also identified that the recent updates from Statistics New Zealand (NZS2017) should be applied to the finalised Growth Management Strategy. I concur with that approach. The use of the NZS2017 projections aligns with the wording used in the NPS-UDC, that seeks that Council’s account for demographic change using the most recent Statistics New Zealand Population Projections⁴.

Statutory Basis for planning for demand

The Timaru District Council has a statutory basis for planning for housing and business land to meet demand, and the integration of infrastructure to meet such demand. In summary:

- **Resource Management Act. Section 75(3)(a)** ‘Contents of District Plans’ states that a District Plan is to *give effect* to any National Policy Statement.

Pursuant to the NPS-UDC, local authorities are to ensure that one time there is sufficient housing and business land development capacity for the *short, medium and long term* (as set out in the requirements of **Policy PA1**). **Section F** of the DGMS sets out the long term projected demands for housing and business in the main urban settlements. The DGMS identifies such a buffer demand for both business land and housing, despite their being no statutory requirement to provide such. This is undertaken in **Section A:2.4** ‘Growth Areas’ of the DGS.

- **Resource Management Act. Section 75(3)(c)** ‘Contents of District Plans’ states that a District Plan is to *give effect* to any Regional Policy Statement.

The Canterbury Regional Policy Statement (2013), sets out the relevant regional framework for managing land use and infrastructure (Chapter 5). Relevant and detailed provisions are identified and applied in this report when considering relevant submissions.

- **Resource Management Act: Section 31(1)(a)** the Council’s statutory mandate to ensure the *‘integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district’*.
- **The Resource Management Act 2017 (Section 31(1)(aa)):**

³ Attachment A. Property Economics. Section 1.

⁴ National Policy Statement -Urban Development Capacity (2016). Policy PB2(a).

“(aa) the establishment, implementation and review of objectives, policies and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district”.

- **Local Government Act (s10):**

The purpose of local government is –

- (a) to enable democratic local decision-making and action by, and on behalf of, communities; and*
- (b) to meet the current and future needs of communities for good-quality local infrastructure, local public services, and performance of regulatory functions in a way that is most cost-effective for households and businesses.*

In summary, the Timaru District Council is to provide for projected demand, but to do so in a way that is both prudent, environmentally sustainable and integrated, robust, and is the most cost-effective in terms of meeting associated needs for good-quality local infrastructure and local public services.

The DGMS identifies at Section C:2.5 that the **Managed Growth Approach** represents the better approach to achieving these aims, which seeks consolidated and limited expansion as necessary in strategically located areas.

As outlined by Mr Heath, the NZS Medium Series projections provide a robust and proven foundation for identifying likely future demand. It is acknowledged that any forecast is simply that, and will be subject to change. Accordingly, submissions seeking the use of alternative forecasts (that is non-SNZ projections) are recommended to be **rejected**⁵.

The NPS-Urban Development Capacity imparts a statutory obligation for the Timaru District Council to undertake ‘A robustly developed, comprehensive and frequently updated evidence base to inform planning decisions in urban environments’ (Objective OB1). Whilst not applicable to Timaru District⁶, the NPS-UDC identifies the need for local authorities every three years to carry out a housing and business development capacity assessment (Policy PB1) that:

- (a) Estimates the demand for dwellings, including the demand for different types of dwellings, locations and price points, and the supply of development capacity to meet that demand, in the short, medium and long-terms;*
- (b) Estimates the demand for the different types and locations of business land and floor area for businesses, and the supply of development capacity to meet that demand, in the short, medium and long-terms.*

Section G:2 of the DGMS ‘Monitoring and Review’ requires a three-yearly review of major changes in demographics, as well as monitoring key indices associated with:

- *Residential development (number, type, location, land area, density and rate of take up of new households);*

⁵ Sub 3.2 CBD Investment and Strategy Group; Sub 18.3 Rolling Ridge et al; Sub 21.5 Insights; Sub 46.2 South Canterbury Chamber of Commerce; Sub 48.1 SM Fraser et al; Sub 65.2 Riverside Estate; Sub 66.2 A McCleary; Sub 67.2 LP & JA Moodie.

⁶ As the settlements are not defined as either a *medium-growth urban area* or *high-growth urban area* under the NPS-UDC.

- *Commercial development (number, type, location, land area and rate of take up of new commercial developments);*
- *Industrial development (number, type, location, land area and rate of take up of new industrial developments);*
- *Rural living development (number, type, location, land area, density and rate of take up of new households).*

Accordingly, a change in either demand through an increase (or decrease) in forecast growth, as well as changes in demand and demand types is adequately addressed in the DGMS.

Part B – Macro Issues and Growth Projections

2.0 Key Issues

2.1 Matters of Support

The key matters of support are addressed below and not considered further except where raised in a specific submission.

2.1.1 Vision

There is almost unanimous support for the Vision of the DGMS which states:

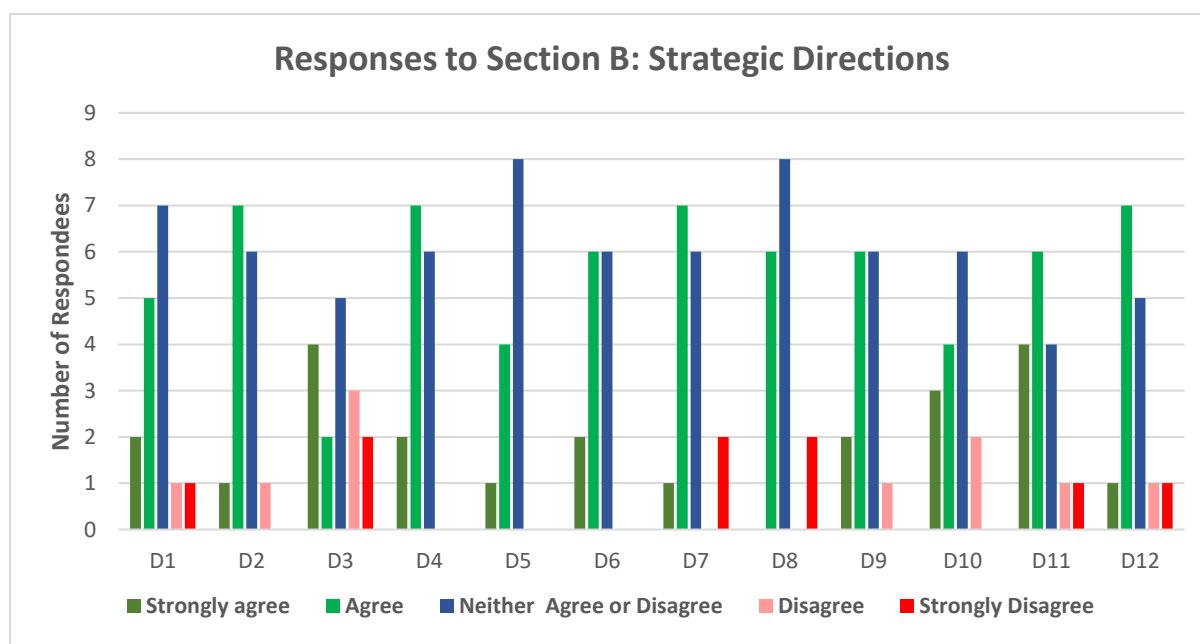
“A District where land use and growth is sustainably managed to ensure a fantastic lifestyle, thriving economy and strong identity”.

2.1.2 Strategic Directions

Apart from minor wording changes the Strategic Directions are supported (Section A2.3) in terms of the 33 submissions responding to the survey, and where referred to in the more specific submissions (**Figure 6**).

Where submissions recorded concerns with specific Strategic Directions these were either typically associated with specific rezoning requests (examples include Sub 1 S Wolczuk) or advocating for Agency interests (examples include CBD Investment and Strategic Group).

Figure 6: Responses to Strategic Directions



2.1.3 Takata Whenua [D5]

A number of parties registered that they neither agreed nor disagreed with the approach associated with Strategic Direction [5]. The following outlines why the approach undertaken by the Council is required.

Te Tiriti o Waitangi / Treaty of Waitangi 1840 is a foundation document for New Zealand. The Treaty provides for the exercise of kawanatanga (governance by the Crown), while actively protecting tino rangatiratanga (full authority) of tangata whenua in respect of their natural, physical and spiritual resources. For the Timaru District, this role is undertaken by Ngai Tahu as iwi, and Te Rūnanga o Arowhenua as Rūnanga.

The Timaru District Council is not the crown, but it has been empowered by statute to undertake a number of roles on its behalf, including the Local Government Act and the Resource Management Act. These Acts, and others, contain specific provisions to acknowledge the Treaty of Waitangi. By way of example:

- (i) **The Resource Management Act, Section 8** seeks to take into account the principles of the Treaty of Waitangi when managing the use, development, and protection of natural and physical resources.
- (ii) **The Local Government Act, Section 4** seeks to recognise and respect the Crown's responsibility to take appropriate account of the principles of the Treaty of Waitangi and to maintain and improve opportunities for Māori to contribute to local government decision-making processes.
- (iii) **The Conservation Act 1987, Section 4** requires administrators managing lands under the Reserves Act 1977 to give effect to the principles of the Treaty of Waitangi including when formulating and implementing Council's reserve management policy.

2.1.4 Rural Residential - the approach

Submissions on rural residential development are typically supportive in terms of a zoned approach. Submissions specifically identify that the current dispersed approach should be replaced with a focused zoned response to prevent sprawl⁷.

Three submitters supported a continuation of the current approach⁸.

There are submitters that are either supportive of the approach subject to their interests being included for rezoning, or neutral subject to their interests being rezoned for rural residential opportunities.

The DGMS provides a zoned response to the provision of rural residential development based on:

- *The adverse effects of dispersed or oversupplied rural residential development.*
 - Reverse sensitivity adverse effects from accepted impacts generated by farming, factory farming and rural industrial activities.

⁷ Sub 2.3 Burdon, 7.1 Eggely, 10.4 Ross and 20.1 CRC, 25.4 Federated Farmers, 31.4 A Young.

⁸ Sub 28.2 Hay, 17.1 Morton, 73.3 Speirs

- The reduction of farming and productive opportunities through land fragmentation and modification of land for rural residential purposes.
 - Implications on infrastructure, including traffic safety through additional accesses to service rural residential development, and expectations for servicing.
 - Expectations and requests for infrastructure servicing.
 - Impacts on water quality.
 - Reduction of rural visual character by rural residential buildings and activities.
- *The disjunct between the Timaru District Plan 2005 (the **operative District Plan**) approach to rural development and urban consolidation:*
 - There is no strategic policy and approach for the provision of managed rural residential opportunities.
 - Opportunities for dispersed rural residential development are provided through the ‘entitlement approach’ which enables relatively small rural allotments and land use for single households across the Rural 1 zone as related to a larger balance lot. A number of discrete small lot rural subdivisions have been created in rural areas predominantly as located around the Timaru township in a manner not consistent with the strategic approach set out in the District Plan. As stated in *LR Rawlings vs Timaru District Council* ENV-2012-CHC-000039 [68]:

“The evidence which we heard established that notwithstanding the very clear provisions of the district plan which seek to ensure that subdivision protects and enhances rural character and that intensification of development close to Timaru is to be limited, the Council has continued to approve more intensive subdivisions for residential lifestyle blocks within Mr Glasson’s Peri Urban Zone, since 2005”.
 - This matter has been addressed, in part, as Council introduced the Geraldine Downs Rural Residential (Geraldine Downs) zone. A private plan change has also introduced a Rural Residential zone on Brookfield Road, south of Timaru.
 - *The directive regional policy approach introduced through Chapter 5 of the CPRS:*
 - The RPS seeks to enable and provide for rural residential opportunities in terms of providing sufficient housing choice (**Objective 5.2.1(b)**).
 - Caveats include that rural residential development does not detract from:
 - An overall approach of urban consolidation **Objective 5.2.1(a)**, **Policy 5.3.1(1)(b)** and **Policy 5.3.2**; and
 - are limited, and of a form that concentrates or is attached to existing urban areas (**Policy 5.3.1(1)**); and
 - do not foreclose the productivity of the region’s soil resources, including through fragmentation (**Policy 5.3.2(1)(c)**, **Policy 5.3.12(1)**).
 - The definition of Rural Residential which states:

*“Rural Residential development **means zoned residential development** outside or on the fringes of urban areas which for primarily low density residential activities, ancillary activities and associated infrastructure”. (Emphasis added)*

A zoned approach to the provision of rural residential opportunities in the DGMS replaces the previous ‘entitlement approach’ in the operative plan. The DGMS zoned approach seeks to manage both the location and the quantum of Rural Residential opportunities in the District.

- The location of Rural Residential development is to be focused (and *occurs in a form that concentrates, or is attached to, existing urban areas* **(CRPS Policy 5.3.1(1)(b))**),
- The quantum by which Rural Residential development contributes to all residential growth in the District should not derogate from a primary focus on *concentrating and consolidating existing urban areas* **(CRPS Objective 5.2.1(1), Policy 5.3.1(1)(b))**.

Submissions seeking a continuation of the existing exceptions approach are recommended to be **rejected**⁹. Submissions seek a targeted zoned approach to rural residential development are recommended to be **accepted**¹⁰.

The quantum and location of that approach as applied is discussed in relation to specific submissions in Section 5 ‘Rural Residential’.

⁹ Sub 28.1 Hay, 17.1 Morton, 73.3 Speirs

¹⁰ Sub 2.3 Burdon, 10.4 Ross and 20.1 CRC, 25.4 Federated Farmers, 31.4 A Young

3.0 Matters of Opposition – Household Demand

3.1 Growth Expectations

Parties have raised issues that either:

- That the growth forecasts utilised for the DGMS are overly conservative and not borne out by recent apparent developments or building consent trends¹¹;

Or

- An oversupply of industrial, commercial and residential land should be pursued as an ambitious growth target and to keep land prices in check¹².

A number of these parties also sought rezoning.

Section 1.3.5 identifies the statutory basis of the New Zealand Statistics medium series projections as the basis of the Growth Management Strategy. Those submissions seeking an unspecified alternative to projecting growth are recommended to be **rejected**.

As also stated in **Section 1.3.5** it is incumbent on the Timaru District to utilise the most recent NZ Statistics Growth Projections. As identified by Property Economics, the NZ Statistics Projections have been updated since the notification of the DGMS. The differences, and implications for recommendations are identified below.

3.2 Application of the updated growth projections

Property Economics (**Attachment A**) have set out the economic update and elements that relate to their recommended projections to be used within recommendations for feedback to the DGMS.

Property Economics identify three main elements that drive differences with their previous reports¹³, and cumulatively identify a modified growth profile for the District. These are:

- The updated Statistics New Zealand projections (NZS2017);
- An extended projection timeframe, with a base year of 2018 projected to 2048; and
- NPS-UDC application of buffers.

I concur with Property Economics. Below I have briefly identified the implications in terms of recommendations for submitters and the DGMS.

1. The DGMS base used the New Zealand Statistics medium series projections between 2013 and 2043 (NZS2015). The 2015 SNZ projections were derived from the 2013 NZ Census.

¹¹ Sub 3.2 CBD Investment Group, Sub 21.1 and 21.5 Insights, Sub 43.2 GA & JL Ward, Sub 36.1 RP&PB Summons Trustees, Sub 55.1, 55.3 NA & SI Walker, Sub 56.1, 56.3 Levels Golfing, Sub 58.1, 58.2, 58.3 Clarebrook Farms, Sub 61.1, 61.2, 61.3 GW&DS Craig et al, Sub 62.3 DA & RM Coupland, Sub 63.2, 63.3 ZJ Poplawski et al, Sub 64.2, 64.3 AJ&CA Brosnahan, Sub 68.1, 68.2, 68.3 KD&MJ Cahill, 54.1, 54.1 Milward Finlay et al, Sub 46.2 South Canterbury Chamber of commerce, Sub 48.1 SM Fraser et al, Sub 55.3 NA & SI Walker, Sub 65.2 Riverside Estate, Sub 66.2 A McCleary, Sub 67.2 Davis Ogilvie, Sub 70.1 South Canterbury Branch of Surveyors.

¹² Sub 4.1 H Larsen, Sub 6.2 M Thompson, Sub 18.3 Rolling Ridge et al, Sub 22.4 N Gilkison.

¹³ Growth Assumptions Report: Retail (2015) and Industrial (2016).

2. The NZS2015 projections, starting at the 2013 base year are summarised in Figure 7.

Figure 7: NZS2015 (consultation DGMS) 2043 population and household projections

	2013 Population	2013 Households	2043 Population	2043 Households
Timaru District	45,400	19,300	48,600	21,511
Timaru Settlement	26,770	11,380	26,570	11,760
Pleasant Point	1,320	561	1,800	797
Geraldine	2,370	1,008	2,600	1,151
Temuka	4,180	1,777	4,350	1,925

3. The capacity analysis, as undertaken by the Timaru District Council in December 2016 is summarised at Figure 8.

Figure 8: Residential capacity

	Residential (allotment) Capacity (Dec 2016)
Pleasant Point	129
Geraldine	84
Temuka	141
Timaru	667

4. Property Economics have advised that the updated NZS2017 projections, as released early in 2017 should be used to finalise the DGMS. These are the *most recent Statistics New Zealand population projections*¹⁴. Property Economics also advise that 2018 should be used as the base year for the application of projections, rather than 2013 as used in the DGMS. The reasons are:

- “...applying 2018 as the base year assists with the NPS-UDC analysis, and 2018 estimate grounds the analysis to a Census year”;
- “The 2013 base year in the previous reports is no longer valid when determining future net additional growth as much of the 2013 – 2018 may have already occurred, and therefore avoids any double counting in the growth profiling.”¹⁵

I concur with that approach.

There are two additional consequences:

- Growth periods used in the DGMS. The short term (3 year), medium term (10 year) and long term (30 year) NPS-UDC growth periods as used for the DGMS become the years 2021, 2028 and 2048 respectively.

¹⁴ Policy PB2(a) of the NPS-UDC identifies that local authorities should use, as a starting point, the most recent Statistics New Zealand projections.

¹⁵ Attachment A. Property Economics. Page 8.

- Secondly, there is less overlap and subsequent greater accuracy aligning the residential supply survey (December 2017) with the 2018 projected base year, than the 2013 base year used in the consultation version of the DGMS.
5. The NZS2017 projections recommended by Property Economics, with a 2018 base year are summarised in Figure 9.

Figure 9: NZS2017 - 2048 population and household projections

	2048 Population	2048 Households
Timaru District	50,200	22,200
Timaru Settlement	27,550	12,200
Pleasant Point	1,610	710
Geraldine	2,710	1,210
Temuka	4,360	1,930

6. Property Economics have recommended that the buffer or capacity margins identified in the NPS-UDC be applied¹⁶. These were used in the DGMS. Figure 10 identifies the recommended 'year' period and capacity buffer.

Figure 10: Buffer capacity and projection years.

	Year	Capacity Buffer
Base year	2018	
Short Term (year)	2021	20%
Medium Term (year)	2028	20%
Long Term (year)	2048	15%

7. Property Economics at Table 2 (Attachment A) identifies for each of the settlement areas a comparison between the as notified DGMS (based on the NZS2015 projections) and the recommended approach (the NZS2017 projections). The implications of applying those projections, based on the capacity identified in Figure 8, and the time periods and capacity buffer in Figure 10, are identified below in Figure 11.

¹⁶ The NPS-UDC statutory requirement to apply buffer capacity for household and business demand does not apply to Timaru District Council. It is not a medium or high growth area for the purpose of NSP-UDC **Policy PA1** and **PC1**.

Figure 11: Residential Demand vs Supply NZS2017, and Capacity Survey December 2016

Settlement	2021 (short term, demand + 20%)	2028 (medium term, demand + 20%)	2048 (longer term, demand + 15%)
Timaru (Baseyear-2018 11,880 households)	264	588	368
Timaru Supply	667		
Timaru Supply Buffer	403	79	299
Timaru Total Projected Household Demands (Baseyear-2018 additive to 11,880 households)	12,144	12,468	12,248
Temuka (Baseyear-2018 1,860 households)	48	108	81
Temuka Supply	141		
Temuka Supply Buffer	93	33	60
Temuka Total Projected Household Demands (Baseyear-2018 additive to 1,860 households)	1,908	1,968	1,941
Geraldine (Baseyear-2018 1,070 households)	36	96	161
Geraldine Supply	84		
Geraldine Supply Buffer	48	-12	-77
Geraldine Total Projected Household Demands (Baseyear-2018 additive to 1,070 households)	1,106	1,166	1,231
Pleasant Point (Baseyear-2018 600 households)	24	60	127
Pleasant Point Supply	129		
Pleasant Point Supply Buffer	105	69	2
Pleasant Point Total Projected Household Demands (Baseyear-2018 additive to 600 households)	624	660	727

The implications for the GMS are as follows:

- For Timaru settlement, the 2028 peak demand of an additional 588 households, over the 2018 base-year of 11,880 households can be met within the context of the existing 667 survey supply. Given that household demand peaks at 12,468 households in the medium term before decreasing, reinforces a prudent recommendation to not rezone additional greenfield residential land.
- For Temuka, there is not a material change in demand, the peak demand in 2028 is for an additional 108 households. That longer-term demand for only 81 units (from 2018) can be met with existing supply.

- For Geraldine, a medium-term shortfall of 12 dwellings is identified, with a long term deficit of 77 households.
- For Pleasant Point, the NZS2015 the long-term demand reduces from 271 dwellings being needed to meet demand, to having equilibrium between the survey supply for some 129 households to meet projected 2028 demand of 127 households.

3.3 Assumptions and acknowledgements

The key assumptions and acknowledgements as to residential household demand and capacity used for this analysis are as follows:

- Any projection or forecast is simply that, and will be subject to change. The importance of the GMS is to identify the direction of growth, and outline the management response to it. The appropriate monitoring requirements to update both projections of demand, and capacity of supply is contained in Section G of the DGMS.
- The projected demand utilises a 20% NPS-UDC buffer for short and medium-term timeframes, and a 15% longer term 30-year period. This aligns with the NPS-UDC requirements. There is no statutory requirement for Timaru District to do so; the regulatory imposition of buffer requirements in the NPS-UDC relate only to medium and high growth urban areas, which does not incorporate any of the District's townships¹⁷. Furthermore, the definition of 'urban environment' in the NPS-UDC would only relate to Timaru township¹⁸.
- On the demand side, the projections have not attempted to determine the extent of 'unoccupied houses' or for example demand from such enterprises as Airbnb. It is understood that in metropolitan settlements (for example Auckland and Christchurch) these can account for some 10% of demand. These are accounted for within the application of the short and medium term 20% buffer, and longer term 15% buffer.
- On the supply side, the demand capacity has not attempted to determine actions identified in the DGMS or operative District Plan as to intensification. Figure 15 of the DGMS identifies the median allotment size for each of the townships, which identifies considerable potential for intensification. The median lot sizes are: Timaru (703m²), Geraldine (948m²), Temuka (976m²) and Pleasant Point (1,003m²). Accordingly, it is reasonably assumed that some 5% to 10% of projected demand can be met through intensification, including policy efforts in the district plan to enable minor units, retirement complexes and smaller residential units.
- The use of a **2018 base year to determine demand** is more aligned with the supply based survey of **December 2016 to determine supply**.
 - That is, use of the 2018 base year (and NPS-buffers) projects for Timaru settlement the need for 588 new homes at the peak medium-term period, whereas the 2016 supply data estimates supply for 677 homes.

¹⁷ NPS-UDC: Responsive Planning Policy PC1.

¹⁸ NPS-UDC – Interpretation: **Urban environment** means an area of land containing, or intended to contain, a concentrated settlement of 10,000 people or more and any associated business land, irrespective of local authority or statistical boundaries.

- However, building consent data provided from the Council identifies an average of 70 new dwellings per annum between 2013 and 2016 being consented for new dwellings in Timaru settlement (Figure 12). This is below the 100 dwellings per annum projected in the NZS2017 2013 to 2018 period.
- Accordingly, and in conjunction with the ongoing need for monitoring projections and take up of supply there can be confidence in the figures used.

Figure 12: New Dwellings Building Consents Timaru Urban Area 2013 – 2016

Year	New Dwelling consents
2013	58
2014	50
2015	81
2016	93 (inclusive of 40 units, Pages Road (BCN 002.2016.00000184.001))

Source: Timaru District Council. Note Figures are for Building Consents issued for that year, whereas physical construction may not start or be completed within that year.

- residential capacity was undertaken in **December 2016** based on the following criteria:
 - Land tenure – Sites were not currently occupied for another purpose, e.g. road/accessway, school, hospital, designated areas, carparks, etc.
 - Site area, shape, topography – Unfeasibly shaped or sites that were unduly small were removed, as were sites where the topography would likely restrict residential development opportunities.
 - Sites located entirely within the High Hazard Stop Bank Area where removed
 - Split zoning – Removal of sites with little area within Residential Zone
 - Site use – Sites that had an existing (albeit extensive) commercial or industrial land use were removed.

It is important to note that there is not an exact science to a determination as to feasible development capacity for residential land. However, in addition to the criteria above, the assessment did not extend into a hypothetical assessment of whether every larger lot occupied by one dwelling could be subdivided down to the minimum density permitted in the operative plan. That is the capacity analysis did not provide an allowance for infill of existing occupied sites. Therefore, the capacity determined is conservative and it is reasonable to assume additional infill will also occur.

The downside of the capacity analysis is the assumption that all vacant sites are available to the market. Some will not be put to the market due to owner circumstances, or that sections may be unattractive in terms of location and size.

The key point is that the growth projections include a 20% buffer (medium term, 2028) so are generous, and the existing capacity is conversely conservative in that it does not consider any permitted (or easily consentable) infill / subdivision of existing properties (such as chopping off the back section, or replacing a single dwelling with multiple units).

Between the generous growth projections and conservative estimate of existing capacity there is confidence that supply has not been under-estimated. In addition, Section G of the GMS is clear that it will need to be updated and reviewed on a regular basis, so it can adapt over time should supply or demand patterns change.

As identified in Figure 11, Geraldine requires modest greenfield residential opportunities by 2028 to accommodate a potential shortfall for 12 dwellings, and for the longer term (2048) additional total demand is projected for 77 dwellings. The DGMS identifies Orari Station Road as providing immediate residential rezoning with capacity for 64 dwellings, and a longer term deferred offering for up to 161 dwellings, if needed.

It is recommended that residential growth in Timaru, Temuka and Pleasant Point be met through existing capacity, residential intensification and formalized rural residential zoned opportunities.

The implications for individual residential submissions is discussed in Section 9.

3.4 The Recommended outcome

The Draft GMS places considerable focus on residential intensification.

Strategic Direction [10] Residential seeks to encourage opportunities for higher residential densities near Timaru and Geraldine town centres, and identifies up-zoning around Highfield to provide additional intensification options.

District Character Directive 1 seeks to accommodate 75% of new dwellings in existing townships through a combination of residential intensification and limited greenfield areas. Residential directives include the need to consolidate existing settlements [Directive 1], and provide for a diversity of more intensive housing types [Directive 3].

Updating the projections for each of the townships in Section A:2.4 using the updated (2017) Statistics NZ projections are as follows:

Figure 13: Timaru Settlement Growth Areas

	Population	Households
Current (2016) Base year 2018	26,770 27,650	11,380 11,880
Peak (2033 28)	27,270 28,230	12,014 12,370
2048 3	26,570 27,550	11,760 12,200
Capacity (2016)		667
2048 3 Demand (+15%)		437 368

Figure 14: Temuka Settlement Growth Areas

	Population	Households
Current (2016) Base year 2018	4,180 4,330	1,777 1,860
Peak (2033 28)	4,390 4,450	1,943 1,950

2048 3	4,350 4,360	1,925 1,930
Capacity (2016)		141
2048 3 Demand (+15%)		170 81

Figure 15: Geraldine Settlement Growth Areas

	Population	Households
Current (2016) Base year 2018	2,370 2,500	1,008 1,070
2048 3	2,600 2,710	1,151 1,210
Capacity (2016)		84
2048 3 Demand (+15%)		164 161

Figure 16: Geraldine Settlement Growth Areas

	Population	Households
Current (2016) Base year 2018	1,320 1,400	561 600
2048 3	1,800 1,610	797 710
Capacity (2016)		129
2048 3 Demand (+15%)		271 127

Accordingly, those submissions that requested that the growth projections utilised for the DGMS were overly conservative, are recommended to be **accepted in part**. This is on the basis, that the Statistics New Zealand Medium Growth projections which provide the foundation for the GMS have been updated and identify greater population and household formation rates to 2048. However, utilising a base year of 2018 and the residential capacity analysis of December 2016 identifies that there is not a systemic change in either projections or demand. In fact the 2,200 additional households forecast from 2013 – 2043, becomes demand for 1,800 households from 2018 – 2048, with a base year of 2018.

Those submissions which sought alternative growth scenarios based on either linear projection of building consents, or an ambitious growth option are recommended to be **rejected**.

In summary, the district has a modest level of growth projected to 2048. That growth, as identified by the CRPS is to be utilised in a manner that achieves consolidation (**Objective 5.2.1**). Section A2.1 of the Strategy identifies this in the overview:

“It is important to acknowledge that the rates of growth identified for Timaru are not significant, both relative to New Zealand and also in terms of the existing district’s population. This means that much of what is now in Timaru District will be present and provide the framework to anchor growth to 2045. The Growth Management Strategy seeks to ensure that those elements that make Timaru great now, being its town centres, infrastructure, residential neighbourhoods, and employment areas are maintained and consolidated”.

4.0 Matters of Opposition – Rural Residential Rezoning

4.1 Macro issues

Many submissions received relate to the provision, extent and character of Rural Residential land.

The key issues of dispute relate to:

- The statutory framework;
- The density, character and amenity of the rural residential zone; and
- The demand.

Matters related to specific zone requests are considered in Section 7.

4.2 The Submissions

The submissions can be considered under the following categories:

- Those in support of the zoned approach to Rural Residential provision in the District (as addressed and confirmed in Section 2.1.4);
- A reduced density of Rural Residential development to between 0.2ha and 0.6ha¹⁹.
- Predicted demand for Rural Residential Development is incorrect and artificially low. Market demand comes from retirees seeking modern houses in the rural residential area²⁰.

4.3 The Statutory Framework and application to detached Rural Residential relief

The legislative mandate is set out in Section 1.3.5 of this report and C:2.4 of the DGMS. Ultimately, the Council is to provide for projected demand, but to do so in a way that achieves its functions under the RMA1991 (s31) and its purpose under the LGA2002(s10). Accordingly, there is little point in proposing growth opportunities that would not achieve the purpose of those Acts.

Fundamentally in terms of land use and infrastructure integration, the provisions of the Canterbury Regional Policy Statement are obligatory in setting the DGMS framework. In a comparable manner, the Timaru District Council is obliged to undertake its infrastructure planning and development as consistent with its Infrastructure Strategy²¹ as pursuant to s101B of the Local Government Act.

The CRPS does not predetermine relevant provisions of the DGMS, nor potential growth areas. However, it does substantially confine choices and options. This is appropriate, given the mandate of the Regional Council under s61(1)(a) and s30(1)(gb) of the RMA.

Objective 5.2.1 and **Policy 5.3.1** of the CRPS are of relevance to rural residential development for Timaru district. **Objective 5.2.1** requires development to take place in a consolidated manner that is serviced efficiently. **Policy 5.3.1** has a primary focus on meeting the wider Region's growth needs through sustainable development patterns as stated below (underlining my emphasis):

¹⁹ Sub 60.2, Sub 8.1

²⁰ Sub 36.2, Sub 55.3, Sub 56.3, Sub 58.2, Sub 61.2, Sub 63.2, Sub 64.2, Sub 68.3, Sub 69.1

²¹ Timaru District Council Infrastructure Strategy 2015 – 2045. (Section 2.2)

5.3.1 Regional growth (Wider Region)

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

1. ensure that any
 - (a) urban growth; and
 - (b) limited rural residential development

occur in a form that concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development;

The principle reasons for Policy 5.3.1 states:

Rural residential development is typified by clusters of small allotments usually in the size range of up to 2.0 hectares zoned principally for residential activity. Rural-residential development will need to be well planned and coordinated in order to minimise adverse effects on such matters as: rural character and resources; rural infrastructure including the road network; and not foreclose development options in the vicinity of urban areas.

My consideration of the terminology used above is as follows:

Ensure: means to *make certain* that (something) *will occur*²².

Limited: means *restricted in size, amount or extent; few or small*.

Attached: means *joined, fastened or connected*.

The definition for Rural Residential (non-Greater Christchurch) states:

Rural Residential development means zoned residential development outside or on the fringes of urban areas which for primarily low density residential activities, ancillary activities and associated infrastructure.

Unlike Greater Christchurch, there is no equivalent Regional Policy Statement requirement for potential servicing. (**CRPS Pol 6.3.9** as applied to Greater Christchurch states that Rural Residential areas *"be located so that it can be economically provided with a reticulated sewer and water supply integrated with a publicly owned system, and appropriate stormwater treatment and disposal..."*)

The closest the CRPS gets to the link between servicing and rural residential zoned development (outside of Greater Christchurch) is in the principal reasons for Policy 5.3.1 which states:

"Within the wider region it is important that areas zoned for rural residential development are located close to existing towns and villages so as to ensure efficient utility servicing and patterns of transport."

In an RMA context: *Efficiency* means whether the benefits [of the utility servicing] outweigh the costs, either immediately or over time. Given, the Timaru District context, *efficient* servicing may likely be reliance on septic tanks and water tanks. There should not be an expectation of public servicing of individual rural residential allotments.

Given the above, there are a number of submissions seeking rural residential zoned opportunities that are some distance from either operative urban boundaries, or alternatively rural residential

²² Oxford Dictionary.

zonings proposed in the DGMS. These submissions are identified on the Maps at **Attachment D** with further detail provided in **Attachment E:1**, and are identified as:

Geraldine:

- Submission 33.1 Rezone 22ha at 245 Downs Road for Rural Residential Zone.

Temuka

- Submission 1.2 Rezone Waitohi Road for future Rural Residential.

Timaru

- Submission 37.1 - S Smith, Booker, Irvine, Watson, Moir and Leonard. Rezone to allow minimum allotment of 5ha, located some 3.5km from urban boundary.
- Submission 43.1 - GA & JL Ward and Footes Trustees Limited. Rezone 30ha to Rural Residential zone, located some 3.8km from urban boundary.
- Submission 52.1 - B Pipe. Rezoned Hadlow area to allow for Rural Residential development. This would provide for some 30 – 40 Rural Residential dwellings.
- Submission 55.2 – NA and SI Walker. Located 9km from Timaru urban area, and 600m from Timaru International Motor Racing speedway.
- Submission 56.2 – Levels Golfing Lifestyles Ltd and Timaru Golf Club. Located in close proximity to Timaru Airport (1.4km). Located some 6km from Washdyke
- Submission 58.2 – Clarebrook Farms Ltd. Rezone 102 hectares to Rural Residential zone. Located some 3km from urban boundary.
- Submission 61.2 – Craig et al. 53.5ha to be rezoned Rural Residential to the north of Pages Road. Located some 1km from urban boundary.
- Submission 63.2 Poplawski et al. 50ha to be rezoned to Rural Residential zone. Located some 1km from the urban boundary.
- Submission 68.2. Property at 50 Flavey Road, Timaru of 4ha to be rezoned for Rural residential. Property adjoins submission 56.2. Located in close proximity to Timaru Airport (1.4km). Located some 6km from Washdyke
- Submission 69.2. Property at 417 SH1, Timaru of 4ha to be rezoned for Rural residential. Property adjoins submission 56.2. Located in close proximity to Timaru Airport (1.4km). Located some 6km from Washdyke.

It has been recommended that these submission points be **rejected**. The basis of that recommendation is primarily through the detachment of these properties to urban boundaries; although there are a number such as Submissions²³ that also conflict with Regional Policy as to integration with strategic infrastructure and the ability, or lack thereof, to provide for co-ordinated development. A number of submitters also seek densities of development in excess of what would reasonably be considered rural residential in terms of scale and character (for example Sub 37 seeks a 5ha density for the 'Hadlow Lifestyle Subzone').

These submissions seek relief that land that they own, which is detached from urban areas could be zoned for rural residential development.

²³ Subs 56.2, 68.2, 69.2 and 55.2.

If the GMS is to give effect to the CRPS (**Policy 5.3.1**), it has to *ensure* (as identified above to make certain), that a *limited* (that is restricted in size or extent) amount of rural residential zoning is provided, and only where *attached* (that is joined, or connected) to existing urban boundaries and *supports urban consolidation*.

A number of the submitters are represented by Mr A Rabbidge at Milward Finlay Lobb, who cumulatively have provided submissions seeking relief for over 350ha of land to be rezoned rural residential.

Mr Rabbidge has taken an alternative view to the application of CRPS Policy 5.3.1 on this issue, as below (Sub 55, paragraph 4.9 and 4.10):

4.9 Policy 5.3.1 of the Canterbury Regional Policy Statement refers to “limited Rural Residential households that must be attached to Urban areas to achieve consolidated settlement patterns”. That is under pinned, by a decision to strategically manage infrastructure, however the Timaru District Council has indicated throughout the Draft Growth Management Strategy that there should be no expectation of public funded service provisions of water, wastewater or road infrastructure of a form and function as provided in Urban areas.

4.10 Accordingly, subject to private land owners provide (sic) the services which avoids or mitigates adverse effects on the environment and human health, there is no need to require Rural Residential development be attached to Urban areas. In this instance only water supply will be sought from Timaru District Council via the Seadown Supply.”

The words in the CRPS should be given their plain and obvious meaning.

The general principle of interpreting plan provisions is that the plain ordinary meaning of words must, where possible, be applied, together with a purposive interpretation having regard to the total context of the works and the purpose of the plan (or in this instance the CRPS). Such an approach aligns with the Interpretation Act. Accordingly, I do not see that the approach outlined by Mr Rabbidge could bypass the clear words of CRPS **Objective 5.2.1** and **Policy 5.3.1**. I consider those words to be prescriptive and directive.

CRPS **Policy 5.3.12 ‘Rural Production’** provides further contextual support to my interpretation. That Policy seeks that Canterbury’s rural productive economy is to be maintained by avoiding development and / or fragmentation that forecloses the ability to make appropriate use of that land for primary production; or results in reverse sensitivity effects that limit primary production.

4.4 Rural Residential Density

The DGMS establishes a density for Rural Residential development at between 5,000m² and 2ha. That size range is based on:

- The principal reasons and explanation supporting **Policy 5.3.1** (Regional Growth) of the CRPS sets out that rural residential development is typified by clusters of small allotments usually in the size range of up to 2.0 hectares zoned principally for residential activity.
- The Timaru District Council District Plan Review Discussion Document: Topic 13 Rural Residential Areas identifies rural residential development as:

Land holdings that range in size from between 0.5ha to 2ha [that] are able to demonstrate the residential and rural character elements that typify rural residential environments. They are also

demonstrably larger than the median urban allotment size in Timaru, Pleasant Point, Temuka and Geraldine which range from 700m² to 1,000m². Properties that are greater than 2ha in size generally continue to be productive and are predominantly retained for rural purposes, small holdings or hobby farms.

- rural amenity expectations and the need for land to be suitably extensive to demonstrate residential and rural character elements and (typically) an absence of public servicing infrastructure. Below 5,000m² there is a clear expectation for servicing associated with an inability to provide on-site utilities, and also a more urban and manicured environment tends to prevail. Greater than 2ha tends to result in less intensive development at the expense of additional rural land to meet demand.
- Existing Timaru District Plan Rural Residential zones:
 - Geraldine Downs includes a Rural Residential subzone that allows lots down to 2ha.
 - The Rural Residential (Brookfield Road) zone adjoining the Timaru urban boundary provides a minimum allotment size of 5,000m².

Accordingly, it is recommended that 5,000m² to 2ha remains appropriate, and consistent with the CRPS requirements and wider Council practice. Submissions seeking a smaller density are recommended to be **rejected**²⁴.

Environment Canterbury Officers have advised that there is not a one-size fits all minimum allotment size for Rural Residential allotment size, but have advised on specific Regional Plan provisions regarding on-site wastewater discharge²⁵ and water supply²⁶.

An appropriate mechanism is required where rural residential landholdings can be developed, and appropriate minimum yields determined, as subject to identifying servicing arrangements, obtain necessary consents from Environment Canterbury and ensure that rural residential developments are integrated (in terms of access and stormwater), or are otherwise developed in a comprehensive manner. Typically, this is undertaken by way of an Outline Development Plan (ODPs). The Timaru District Council has identified that the lead party for developing such ODP's or comprehensive subdivision plans should fall on prospective developers.

This issue does not need to be resolved in the DGMS. Options exist through the upcoming replacement District Plan process from: deferring rural residential zoned development until an ODP has been prepared and notified; to having differing consent status for rural residential subdivisions based on the presence of an ODP, or comprehensive multi-lot subdivision plan. Given that the DGMS will be in place in advance of the District Plan Review, there is the potential for landowners to prepare ODPS and then seek to have them incorporated into the District Plan through discussions with Council officers (pre-notification of the Plan), via submission on the District Plan during that review process, or as a private plan change following the proposed District Plan being made operative.

²⁴ Sub 60.2, Sub 8.1

²⁵ Under the LWRP (RD rule 5.9), sites less than 4 hectares require resource consent for on-site discharge of wastewater. As part of considering any application Environment Canterbury would assess groundwater effects. Only sites 4 hectares or larger are a permitted activity (subject to conditions) under the LWRP.

²⁶ For water supply. If an allotment relies on both on-site water supply (from groundwater) and on-site wastewater treatment (septic tank), then there may be risk of contaminating its own water supply (and others in proximity) where allotments are smaller than 4 hectares. Dependent on soil conditions, it may be difficult to meet separation distances for 5,000m² minimum allotments.

Action A1.2, currently identifies that the Timaru District Council is the Lead Agency in terms of establishing Outline Development Plans for greenfield rezonings, including the Rural Residential zone. Based on the advice of Environment Canterbury, Timaru District Council Officers and those matters identified above, the lead 'agency' for such developments should fall on Private Developers including determination of allotment sizes for rural residential zonings. The appropriate mechanism to deliver rural residential development should also be made more explicit:

Action No	Action	Lead Agency	Support Agency	Cost implications (\$ - low, \$\$\$ - high)	Implementation Tools	Achieves Strategic Direction
A1.2	Develop and implement Outline Development Plans and / or comprehensive multi-lot subdivision plans for greenfield areas, including establishing minimum allotment sizes for identified Rural Residential zones as associated with the ability to provide for efficient and effective infrastructure (assumed self-reliant for water and wastewater)	Private developers. Timaru District Council	Private developers, NZTA Timaru District Council	\$\$	Replacement District Plan, Structure plans for greenfield development.	1, 3 8 and 10

4.5 Rural Residential Demand and Submissions

There are a number of submissions²⁷ that consider that the growth provision for Rural Residential zoned areas is deficient to meet demand. These submissions are coupled with a rural rezoning relief.

Conversely, others such as Federated Farmers (Sub 25.1) and the Canterbury Regional Council (Sub 20.1) consider that rural residential demand has been appropriately provided for in the DGMS.

The DGMS identifies that between 2005 and 2015, 16% of the District residential building consents was allocated to rural residential development. A continuation of those projections would require supply for 288 dwellings (16% of 1,800²⁸) The DGMS provides sufficient capacity to provide for rural lifestyle opportunities with capacity for 465 dwellings at 5,000m², or 233 dwellings at 1ha. Against a backdrop of urban consolidation, additional volumes through dispersal or additional rural residential zonings are considered inappropriate. If the full capacity of 465 dwellings were taken up then this

²⁷ Sub 36.2 RP & PB Simmons, Sub 43.2 GA & JL Ward, Sub 52.2 B Pipe, Sub 54.4 Milward et, Sub 55.3 NA and SI Walker, Sub 56.3 Levels Golfing, Sub 58.3 Clarebrook Farms, Sub 61.3 GW&DS Craig, Sub 62.3 DA & RM Coupland, Sub 63.3 ZJ Poplawski et al, Sub 68.3 KD & MJ Cahill, Sub 70.1 Davis Ogilvie (Aoraki).

²⁸ Property Economics. Attachment A Table 1 Household Projections NZS2017 Projections.

represents over a quarter of all household growth over the coming 30 years being provided through this one housing typology.

Milward Finlay Lobb, C/- Mr A S Rabbidge has provided feedback for many of the parties seeking additional rural residential rezonings. Those submissions raise issues that:

- The DGMS does not provide sufficient residential capacity;
- Accordingly, further rural residential zoned land is required beyond those areas identified in the DGMS.
- The rural residential demand analysis by Timaru District Council for that period of 2005 – 2015 results in a predicted annual demand of 18 rural residential households per annum. There are variables which have depressed demand over that period. These include:
 - The *Pilcher vs Rawlings* Environment Court case [2013, NZEnvC67] which declined rural residential consent;
 - The Global Financial crisis 2008/2009;
 - The take up of subdivision entitlements under the District Plan exemption approach had generally been completed prior to 2005;

A continuation of the yearly average 18 rural residential households per annum results in demand for 541 Rural Residential dwellings. Other submitters (**B Pipe, Sub 52.2**) extend this demand to the need for 900 Rural Residential allotments.

Calculating demand for rural residential development is difficult. In part, this is due to the operative District Plan exemptions approach which enables a disjointed supply.

Rural residential development in the district is to achieve *consolidation in* and *attached* to existing urban areas, with only *limited* rural residential opportunities.

- CRPS **Objective 5.2.1** seeks that *‘development is located and designed so that it functions in a way that:*
 - (1) *achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region’s growth; and*
 - (2) *(b) provides sufficient housing choice to meet the region’s housing needs;*
- CRPS **Policy 5.3.1**, as identified, seeks to *ensure limited* rural residential development occur in a form that concentrates, or is attached to, existing urban areas and promotes a *coordinated* pattern of development.

Overall, reliance on the linear extension of previous building consent data to determine rural residential demand is considered inappropriate (recommend **rejection** of Sub 54.2) due to the following:

- (a) A directive Regional Policy Statement that identifies that rural residential development is to be *limited* and subservient to an overall approach where growth consolidates existing urban areas.
- (b) The NPS2017 growth projections that identify an overall slow-down in growth, with a 2048 demand for 1,800 new dwellings within the District²⁹.

²⁹ Property Economics, Attachment A – Table 1

- (c) An aging population, and the composition of households to also likely change, with a proportional decrease in 'family households' and an increase in 'one-person households'³⁰ which likely decreases demand for space extensive rural residential properties. This matter is also raised within the Submission from Federated Farmers (**Sub 25.2**) which is supported.

Figure 11 identifies sufficient residential land to meet demand generated, except for Geraldine. For Geraldine additional greenfield residential areas are proposed at Orari Station Road.

The CRPS **Policy 5.3.1** identifies that the provision of Rural Residential development should be limited to satisfy a segment of household choice. Converting significant tracts of rural land to facilitate rural residential development to address affordability, or satisfy market demand is not consistent with the consolidation aims of the CRPS.

I consider that determining 'sustainable demand' for Rural Residential development in the DGMS is guided by:

- what would constitute *limited* supply of this segment of the household market (**CRPS Policy 5.3.1**);
- the modest extent of growth forecast for the district, and using that household growth primarily to *consolidate* (**CRPS Objective 5.2.1(1)**) and *concentrate* urban areas (**CRPS Policy 5.3.1(1)**).
- That the 2005 to 2015 average of 16% of the district's building consents for dispersed rural residential development represents an inappropriate high-water mark, given the directive approach in the CRPS.

Based on the NZS2017 forecasts, Figure 17 quantifies the proportion of total household yield provided for by rural residential development at 5%, 10%, 15% and the status quo of 16%.

It is considered that a quantity between 5% and 10% of all household growth to 2048 would be more consistent with the CPRS approach outlined in **Policy 5.3.1**, and yet still provide for demand of this household type. As noted above, the capacity identified in the DGMS for rural residential housing is approximately 15-25% depending on ultimate built-out and densities.

Figure 17: Rural Residential Demand as a proportion of total District household demand

	10 Year (NPS medium term)	30 year (NPS long term)
% of households provided in Rural Residential zones within the District	1,200 households (District wide)	1,800 households (district wide)
5%	60	90
10%	120	180
15%	180	270
16% (status quo)	192	288

³⁰ Growth Options Assessment. Section 1 – District Growth Assumptions. Figure 1.5: Natalie Jackson, University of Waikato.

Submission 52.2 seeks a 'conservative forecast' of 900 rural residential dwellings. This would provide half of the District's long-term household demand through Rural Residential provision. The submission is recommended to be **rejected**.

The DGMS provides sufficient capacity to provide for rural lifestyle opportunities with capacity for 465 dwellings at 5,000m², or 233 dwellings at 1ha. Conservatively, applying the lower figure of 233 illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long-term demand (to 2048) can also be accommodated of between 90 – 180 dwellings.

Monitoring within the DGMS also requires continual evaluation of both zoned supply and demand, this can be responded to in iterations of the Growth Strategy.

Accordingly, submissions seeking that the supply of rural residential land is insufficient to meet demand is recommended to be **rejected**.

5.0 Matters of Opposition – Industrial and Commercial Land

5.1 The submissions

5.1.1 Industrial submissions

The South Canterbury Chamber of Commerce (SCCC) have requested that the GMS provide an oversupply of serviced Industrial land (**Sub 46.2**). Similarly, Davies Ogilvie (Aoraki) (**Sub 70.1** and **70.3**) and others³¹ suggest that additional Industrial land be made 'available including to reduce land banking'.

The SCCC approach also seeks to encourage new economic investment in the District, in a manner like the Izone Industrial Park (Rolleston) or Ashburton Business Estate, with both these Parks on Council-held land and initiated by the Council as developer.

5.1.1 Commercial submissions

Foodstuffs (**Sub 35.1**) supports the reinforcement and consolidation of existing commercial centres and the priority intensification of the Highfield area.

Although Foodstuffs (**Sub 35.2** and **Sub 35.3**) oppose a blanket ban on new commercial land, and seek flexibility for future expansion of existing commercial centres to accommodate increased demand brought about by residential intensification respectively.

Submissions from B Speirs (**Sub 73.5**) consider that the alternative commercial areas have grown because the Timaru CBD does not have land for Large Format Retail (Supermarket, Warehouse, Harvey Norman) at a reasonable cost.

5.2 The Industrial Projections (Supply and Demand)

Property Economics has (Attachment A) identified at Table 7 of their report the latest industrial land figures provided by the Timaru District Council.

That register identifies a total industrial land supply of around 719ha, of which 203ha is vacant, and 152 ha is zoned, useable, vacant and presently available.

The Appendix to the Property Economics report, which further distinguished industrial nodes by settlement area identifies Timaru township having 15.65ha of vacant serviced light industrial land, and 35ha of vacant serviced heavy industrial land.

In blunt terms, over 28% of the current zoned land supply is vacant. Some 21% of the District's zoned Industrial land is zoned, useable, vacant and presently available.

Industrial land demands for the District were stated in Table 7 of the DGMS, as based on the Property Economics 2015 report³². Projected demand till 2043 was 33.8ha or 38.9ha with a 15% buffer.

Property Economics (Attachment A, Section 5) have updated their Industrial Land forecasts (Section 5 of the Growth Assumptions Report), based on:

- Application of the NZS2017 medium series projections; and

³¹ Sub 6.2 M Thomson, Sub 48.1 SM Fraser et al, Sub 66.2 A McCleary, Sub 67.2 LP and JA Moodie

³² Property Economics (2015). Growth Assumptions Report. Industrial Growth Assumptions. Section 5.

- Extension of the projection period from 2018 to 2048.

Industrial demand for the 10-year (NPS medium term) period is 40.8ha, and in the 30 year (NPS long term to 2048) for a total of 91.5ha³³. Existing Industrially zoned land in Timaru District that is vacant, useable and available (76ha) currently provides almost double the calculated land demand for the medium term projected demand of 40.8ha.

As also identified by Property Economics:

“...given the 2048 estimated land requirement of 91.5ha, the district is well served when assessing future industrial land demand against existing zoned vacant industrial land capacity. This updated analysis shows the district has more than sufficient zoned vacant industrial land supply to meet the District’s future industrial requirements for the first half of the century”. (Attachment A, pg 15)

For those submissions that raise concerns regarding land-banking, I recommend that these be **rejected** based on the following:

- Land-banking does not of itself represent a shortfall of available Industrial land supply. I understand that there are a limited number of prominent Industrial landowners in the market, and that these place caveats on the availability of land (leasing, provision of built form). However, I note that this is common in New Zealand, and results in market distortions only where there is a monopoly and / or inflated relative costs associated with Industrial development. I am not aware that that is the case.
- I understand that there is diversity of ownership including agencies such as the Timaru District Council, and Timaru District Holdings Ltd (Sub 5).
- Figure 19** identifies multiple land owners as related to the Washdyke expansion area, in addition Section 6 of this report recommends additional opportunities at:

Figure 18: Recommended Industrial Land opportunities

Settlement	Location	Area (ha)	Submission / Owner
Geraldine	Tiplady	10.0	DGMS
	McKenchie Street	1.4	Sub 47.1 Majors
Washdyke	Washdyke Flat Road	5.1	Sub 24.1 Seadown
Timaru	Showgrounds Site	Compatible Light Industrial within the Commercial 2A zone	Sub 5.1 Timaru Holdings

³³ Property Economics. Attachment A. Table 6.

Figure 19: Industrial Land ownership Washdyke Expansion Area



5.3 Commercial Provision

Demand for **office** activity in the district is identified in Section 4 of the Growth Assumptions Report:

“the growth of office and administration activities will consequently lead to moderate increased demand for commercial floor space for office use. However, it is considered that such growth will generally be accommodated by way of refurbishment of existing buildings, particularly in Timaru’s CBD, as opposed to new builds. As such, it is not considered that the demand for offices will result in a requirement for additional commercial zoned land”.

The assumptions report does not contain specific evidence on this matter. In that absence it is noted that the Timaru District Town Centres Study (2016) does identify, specifically for Timaru CBD a material proportion of vacancies and identifies urban renewal, occupation and re-use as a key focus for existing buildings. Accordingly, and in the absence of submissions in opposition the Assumptions Report statement is accepted.

The **Retail** Market Assessment (Section 6 of the Growth Assumptions Report) was provided by Property Economics (2015).

Retail land demands for the District were stated in Table 7 of the DGMS, as based on the Property Economics 2015 report³⁴. There was a projected deficit of sustainable floorspace of 3,500m², or just over 4,000m² with a 15% buffer. Table 7 identified a 14,635m² oversupply in the short term, reducing to an oversupply of over 3,000m² GFA by 2028 (medium term).

³⁴ Property Economics (2015). Growth Assumptions Report. Retail Growth Assumptions. Section 6.

Attachment A accounts for application of the NZS2017 medium series projections; and an extension of the projection period to 2018 to 2048 (The Property Economics 2015 Report provided a projection period from 2013 to 2033).

The updated Property Economics Report (**Attachment A**) identifies the amended projections in retail expenditure, sustainable demand, and supply differential³⁵. In addition, the 20% NPS UDC buffer for short term and medium-term projections, and the 15% buffer for the long term projection have been added. These are synthesised as follows:

Figure 20: Retail Supply vs Demand Projections: short, medium and long term.

NZS2017 updates	Base Year (2018)	3 Year (NPS Short Term, 2021)	10 Year (NPS Short Term, 2028)	30 Year (NPS Short Term, 2048)
Retail expenditure	\$471(m)	\$492(m)	\$542(m)	\$700(m)
Sustainable GFA/m ²	86,100	89,800	98,900	127,400
Existing provision	100,000	100,000	100,000	100,000
Supply surplus	13,900	10,200	1,100	-27,400

Property Economics state that the surplus of retail GFA is not expected to meet sustainable supply shortly after 2028, that is the next 10-year supply is already present in existing retail floorspace. It is not until post 2028 that additional commercial land for retail will be consumed. Property Economics identify that, based on projected growth, an additional 7ha will be required.

Currently zoned but undeveloped, is the Commercial 2A zone (the showgrounds site).

This 12.19ha site provides surplus commercial capacity (5 ha) to meet demand beyond the 2048 long term period. In addition, the consented Countdown Supermarket (233 Evans Street) and Harvey Norman (226 Evans Street, 6,550m² of compliant Retail Industrial L development) remain undeveloped.

Based on the above, submissions seeking further rezoning of additional commercial land are recommended to be **rejected**, on the basis that there is an oversupply of sustainable floorspace to meet retail demand in the medium term (2028). Additional demand beyond 2028 can be met at the Showground site.

In this context, and based on previous experience, I consider 'sustainable floorspace to be a level of productivity (sales/m²) that allows retail stores to trade profitably and provide a good quality retail built form and environment. As such it represents more than just a 'break even' point.

Dispersed commercial development can increase the opportunity costs that community assets represent; the marginal costs per user can increase; and there are transport efficiencies associated with centralised activity. Consolidation can also mean that there is increased certainty around private and public-sector investment, which has greater importance given the underutilisation of a number of commercial buildings in the Timaru CBD, including those of heritage or character value.

Accordingly, the submission from Foodstuffs (**Sub 35.1**) which agrees with consolidation approach is recommended as being **accepted**. It is noted that neither Strategy Direction [6] or Sustainable Economy Directive 5 does not impede new commercial land or centre expansion, and has been deliberately crafted to not use absolutes, such as 'avoid'. Accordingly, **Sub 35.2** and **35.3** are

³⁵ Property Economics. Attachment A. Table 3 and Table 4.

recommended to be accepted in part, albeit that the GMS will not go as far as nominating areas of centre expansion into Residential zones.

5.4 The Statutory Framework

Chapter 5 of the CRPS sets out the statutory approach to business land, primarily through **Objective 5.2.1** and **Policy 5.3.1**.

Business activity (being both commercial and industrial) is, as ‘development’ to be located and designed to achieve consolidated and sustainable growth around urban areas (**Objective 5.2.1(1)**), and enable people and communities to provide for their social and economic wellbeing in a manner that encourages sustainable economic development by enabling business activities in appropriate locations (**Objective 5.2.1(2)(c)**).

Business activity is to be of a character and form that supports urban consolidation (**Policy 5.3.1(2)**), and ensure business activity (as development) is of a form that concentrates or is attached to existing urban areas, and promotes a coordinated pattern of development.

Lastly, business activities are to avoid or mitigate reverse sensitivity conflicts between incompatible activities (**Policy 5.3.2(2)(b)**).

The following submissions seek an Industrial zoning that are detached from an existing urban area.

These submissions are recommended to be **rejected** on the basis that such a relief would not *give effect* to these requirements of the CRPS. In particular the rezoning are neither attached to an existing urban area, nor would assist coordinated settlement patterns given the macro level of Industrial land supply determined by Property Economics (**Attachment A**) (CRPS **Objective 5.2.1** and **Policy 5.3.1**). As set out above, there is also no need for additional supply and therefore any additional supply is inherently inefficient in terms of requiring additional network servicing infrastructure when such is not necessary to provide for the District’s business needs. Additional detail on each submission request is provided in Attachment E:2.

- Geraldine³⁶
- Orari³⁷
- Timaru³⁸

5.5 Economic Impacts of Oversupply

The Industrial submissions identified either consider that there is a deficit of supply to meet projected demand, or that regardless a more aggressive rezoning approach should be undertaken to ensure ‘Timaru Inc’ remains marketable as an employment and business hub. There are risks depending on the delivery of that approach, as outlined by Property Economics. In summary, these factors are³⁹:

³⁶ Sub 6.3 M Thompson

³⁷ Sub 27.1 R Payne

³⁸ Sub 50.1 SM Fraser et al, Sub 66.1 A McCleary et al, Sub 67.1 LP & JA Moodle

³⁹ Property Economics. Attachment A. Section 6.

- Reduction in the level of productive land;
- Reduced redevelopment;
- Investment uncertainty;
- Attraction of transition business and reduction in long term competitiveness; and
- Increased and dispersed infrastructure costs at a community level for servicing infrastructure which is not needed to provide for the District's business needs.
- Under-capitalisation in terms of low quality built form and absence of reliance and amenity.

Lastly, there is also an underlying suggestion (**SCCC**) that an Industrial Park of some kind would benefit economic growth in the District. It should be acknowledged that an Industrial Park similar to Izone, Rolleston and Ashburton competes on a South Island / national scale, primarily to service the logistics / distribution market. Private investment in such facilities is determined by access to large scale markets, access for freight (rail and road), and current market saturation. This last factor, and the current supply of such land at Ashburton and Rolleston may well undermine uptake for similar facilities in Timaru.

An absence of suitable and appropriate Industrial land resource to meet demand would mute market indicators that Timaru District is open to business. Overly constraining business growth can congest the existing market - artificially inflating land values, increasing rentals for existing businesses, reducing opportunities to accommodate a broad range of diverse industrial activities, and potential leading to transfers to other districts. However, this needs to be viewed in terms of the ability of the existing market to satisfy likely and future growth.

For the Timaru District, as outlined by Property Economics (Attachment A) there is more than sufficient zoned Industrial land, at the macro district level to meet the 10 year (medium term) and 30 year (long term) demand. At a District level, the Industrial market is not constrained. Accordingly, those submissions seeking, at a macro level, additional Industrial zoned land in the district are recommended as being **rejected**.

5.6 Recommended Changes to the GMS

The following changes are recommended to the GMS based on the projections from Property Economics, Attachment A.

Replace Table 7 – Industrial and Commercial land demand – Timaru District with the following:

Table 7A: Industrial Land Demands Including NPS-UDC Buffers

	3 Year (NPS Short Term, 2021)	10 Year (NPS Short Term, 2028)	30 Year (NPS Short Term, 2048)
Industrial additional projected demand (ha)	18.8ha	40.8ha	91.5ha
<i>Existing Industrial Zoned, Useable, Vacant and Presently Available land: 151.7ha.</i>			

Table 7B: Sustainable Retail Demand including NPS-UDC Buffers

	3 Year (NPS Short Term, 2021)	10 Year (NPS Short Term, 2028)	30 Year (NPS Short Term, 2048)
Retail (LFR and Speciality) Sustainable demand floorspace – existing provision	10,200m ² (oversupply)	1,100m ² (oversupply)	-27,400m ² (demand)
<i>Existing Provision 100,000m².</i>			

Part C – Strategic Directions and Remaining Submissions

6.0 Business

The themes within the DGMS for Business activities are encapsulated in Strategic Direction [6] Sustainable Economy

To support areas of economic and district strength through the consolidation and provision of an adequate supply of commercial and industrial zoned land in appropriate locations, as efficiently and effectively serviced by supporting infrastructure.

As identified in Section 2, submissions support the direction of the DGMS in this respect. Matters relating to conservative growth estimates and a macro absence of supply are responded to in Section 5.

Residual themes include:

- Support for a consolidated approach (Sub 35.1 Foodstuffs);
- Micro level rezonings (Sub 47.1 Major, 51.1 Port Bryson Property, Sub 57.1 Harvey Norman, Sub 44 and 45, PSE Properties et al and Juice Products et al);
- Efficient use of existing business zoned property (Sub 5.1 Timaru Holdings Ltd);
- Provision for Centre expansion to respond to residential intensification (Sub 35.4 Foodstuffs);
- Disagreement with the inclusion of Tiplady, Geraldine as a Greenfield Industrial location (Sub 2.2 Burdon).

6.1 Strategic Directions

Submission 11.5 (Frank) supports the approach.

The submission from Federated Farmers to Strategic Direction [6] Sustainable Economy (**Sub 25.11**) considers that there is some repetition with Strategic Directions [1] and [3], and that the word ‘support’ should be replaced with ‘encourage’.

Whilst it is agreed that Strategic Direction 6 replicates the theme of consolidation, apparent in Strategic Directions [1] and [3], this is done deliberately to be explicit that the distribution of business activity within the district is to be integrated with broader land use and infrastructure to achieve broader consolidation outcomes.

The use of the more purposive ‘encourage’ which is more proactive than ‘support’ as currently used in Strategic Direction 6 is agreed with. Accordingly, SD6 is recommended to be amended as follows:

*To ~~support~~ **encourage** areas of economic and district strength through the consolidation and provision of an adequate supply of commercial and industrial zoned land in appropriate locations, as efficiently and effectively serviced by supporting infrastructure.*

6.2 Matters of Support

The following submissions support the approach. These submissions are recommended to be **accepted**.

- Sub 5.2 Timaru District Holdings.
- Sub 20.2 Canterbury Regional Council.

6.3 Matters of Objection

6.3.1 Amendments to Text

Foodstuffs (**Sub 35.3** and **Sub 35.4**) have sought numerous amendments seeking that the DGMS explicitly provide, and identify future expansion of existing commercial centres into residential areas so that existing commercial centres can respond to the increased demand brought about by residential intensification.

The DGMS through seeking a consolidation approach does not provide an absolute impediment to centre expansion, but does not nominate areas of centre expansion into residential zones.

This is in part based on current commercial area surplus. To do so in the DGMS would be out of step with the current levels of commercial supply present as identified by Property Economics, and could also have negative effects on residential intensification efforts. Accordingly, **Sub 35.3** is recommended to be **rejected**.

Submission 35.4 contains numerous explicit insertions into text throughout the DGMS to provide for centre expansion. It is considered that these insertions are unnecessary, and overstate the issue within the context of a Growth Management Strategy. Accordingly, this submission is recommended to be **rejected**.

6.3.2 Micro Rezoning Requests

These submissions are also specifically addressed in Attachment E:3.

It should be noted that these submissions should be carefully considered against the backdrop of the macro level Industrial land surplus as identified by Property Economics (**Attachment A**).

At a micro level, where there is either a township level shortfall of Industrial land (such as Geraldine) or where the current Industrial land use does not reflect the existing settlement pattern, there may be merits in identifying a more appropriate Industrial zoning in the GMS.

Submission 2.2 (L Burdon), Sub 31.2 (A Young) and Sub 12.2 (T Titheridge) disagrees with the DGMS approach of identifying Tiplady in Geraldine for rezoning to Industrial.

Tiplady was considered in the: Options Assessment Report; the Report 'Growth of Industrial Activities in Geraldine – Discussion Document (Oct, 2012); and the Report 'Growth of Industrial Activities in Geraldine – Consultation and Site Analysis Report (June, 2013).

In recommending Tiplady be rezoned to support industrial activities, those reports identified concerns with the fringe / urban separation location, particularly in terms of servicing, but that the site had substantial benefits over alternatives being:

- Strategic location adjacent to State Highway 79 and Tiplady Road that gives:
 - North and west route options along State Highway 79;
 - East route option to State Highway 1;
 - Tiplady Road has a suitable carriageway for industrial activities.
- Flat topography.
- Large landholdings.
- Relatively few different landowners making acquisition of land and coordination of future development easier.
- Relatively cheap land.
- Low density of proximate residential development which would minimise reverse sensitivity effects.
- Parts of the area are not located on Class 1 or 2 versatile soils.
- Profile onto a busy road.
- The 33 Kv electricity line that serves Geraldine runs through the land and can be adapted to serve industrial activities.

The servicing issues associated with this site are stated within the Infrastructure summary in the Options assessment and within the Infrastructure summary of submissions (**Attachment F**). However, given there is only 1.19ha of zoned and available Industrial land in Geraldine to meet localised demand, this option has been considered by Timaru District Council to be the most appropriate. The Report 'Growth of Industrial Activities in Geraldine – Consultation and Site Analysis Report (2013) also confirmed from local business operators (Section 4.2 of that report) that there was a shortage of industrial land in Geraldine and that subsequently more industrial land should be provided, with an edge of town industrial park being preferred.

Accordingly, Submission 2.2 is recommended to be **rejected**.

Submission 47.1 (Major) seeks an Industrial L zoning for the site at 1 Mckechnie Street, Geraldine. The site whilst zoned Residential 1 has a recent land use consent (102.2012.909) which has been given effect to for Industrial activities on a substantial portion of the site. At a **macro level** Industrial zoning (1.4ha) would not impact the wider level district oversupply, and assists with the Geraldine township's present undersupply of Industrial land to meet demand.

The Industrial zoning would be consistent with consolidation approach in **CRPS Objective 5.2.1**, and the site can be serviced (**CRPS Policy 5.3.5** which seeks efficient servicing for development, including sewer and water). Rezoning of the site would also result in a defensible Industrial L boundary and would better reflect the existing industrial land use i.e. rezoning is more about recognising existing use rather than providing for future further development.

A detailed site assessment and associated land use activity rules will need to be applied to the site, prior to rezoning in the replacement District Plan. This is to ensure that an appropriate landscaped setback from Majors Road (to the south and west) can be provided to ensure that amenity at the business and residential zoned interface is maintained (**CRPS Policy 5.3.1(5)**).

The relief is recommended to be **accepted**.

Submission 24.1 (Seadown Properties) seek an Industrial L zoning for the site at Washdyke Flat Road. The site has a split zoning, with the road frontage (some 3ha) zoned Industrial L, and the rear portion (some 7ha) zoned Rural 2. The landowners are seeking consent for a two-stage development, with Stage 1 (as lodged with the Council) being the formation of some nine lots. The Infrastructure Team at the Council have advised that there are no fatal issues in terms of efficiently and effectively servicing the block. Environment Canterbury have advised that flood risk has been determined to be low.

At a macro level, and as identified in the Property Economics Report, there is a district wide surplus of available industrial land beyond 2048. Accordingly, at the macro level, there is no pressure for additional Industrial land to be rezoned to supply the market.

However, at the micro level, this relief only relates to an additional (approx.) 5.1ha of developable Industrial zoned land, and is also consistent with a number of matters within the statutory framework, including that it is bounded on three sides by urban uses, and has good access to the transport network and associated services. Essentially, the site represents an appropriate use and infill of the area for Industrial uses. Attachment E-3 considers the site in greater detail, including advice from Property Economics that rezoning would be acceptable in this instance, although may be at the expense of other vacant or deferred industrial land that will remain dormant and underutilised.

The Options Report (pg 55), which identified this area as *Laughton* recommended that a broader 21ha rezoning option be recommended. In light of the Property Economics report that extent of rezoning would be excessive.

Rezoning to Industrial land would be consistent with the consolidation approach in **CRPS Objective 5.2.1(1)** and facilitate economic enablement under **Objective 5.2.1(2)** through encouraging business activities in appropriate locations (**Objective 5.2.1(2)(c)**). Intensification of the site, as a consequence of the rezoning would not be susceptible to unacceptable flood risk (**CRPS Policy 11.3.1**).

The relief is recommended to be **accepted**.

Submission 48.1 (SM Fraser, AJ Shaw and PA Johnston). Seek a rezoning to Industrial L for the adjoining site(s) to the west of Submission 24.

Environment Canterbury has advised that the smaller portion to the south of the creek is inappropriate to be rezoned for Industrial activities. The balance of the site north of the creek, some 5.5ha, is of a low flood risk (as identified for Sub 24.1 Seadown), and hence is not susceptible to unacceptable flood risk (CRPS Policy 11.3.1).

As discussed in detail in Attachment E-3, the rezoning would provide similar to that for Sub 24.1 Seadown. That is, the proposal would be generally part of the larger Washdyke area. However, the site is distinguishable in part Sub 24.1 in that it is bounded on two sides by rural zoned land, does not represent infill to the same degree, and that there is no demonstrable development plan for the site, nor integration with surrounding development. Accordingly, whilst finely balanced, and based on the macro level oversupply of zoned Industrial land identified by Property Economics, it is recommended that rezoning be **rejected**.

Submission 51.1 (Port Bryson) seeks a 'Business Park' type zoning for the 2ha site at 16 and 18 Hilton Highway, Timaru.

The site is zoned as Residential 1, and should be considered in two parts.

- 16 Hilton Highway (8,624m²) is utilised for Industrial type activities (Trade Suppliers, Bike Concepts (Bike sales) and Lock Up sheds). Buildings on the site containing these activities are relatively recent. This part of the subject site exhibits no residential character nor amenity, and with direct frontage to the State Highway would further reduce any propensity to develop for residential development. The submission seeks commercial business park, including specialist low volume retail and servicing.
- 18 Hilton Highway (1.21ha) is also zoned Residential 1 (as subject to the Broughs Gully Outline Development Plan) and is currently largely vacant. Site access is provided to the State Highway, but would also be available (in future) by access to Tasman Street.

The rezoning of 18 Hilton Highway from residential to industrial is recommended to be **rejected** for the reasons set out in Attachment E-3. Such a relief would increase the extent of industrial / residential interface, and the potential for amenity and reverse sensitivity issues at that boundary. Such an outcome would be less consistent with CRPS provisions seeking to avoid conflicts between incompatible activities (**Objective 5.2.1(2)**) and **Policy 5.3.2(2)(b)**).

The rezoning relief for 16 Hilton Highway is recommended to be **accepted**. The Industrial zoning would not be inconsistent with the consolidation approach in CRP **Objective 5.2.1**, and the site can be serviced (**CRPS Policy 5.3.5** which seeks efficient servicing for development, including sewer and water). The rezoning request for 16 Hilton Highway is distinguishable from other requests given the presence of existing Industrial activities.

At a **micro level** 16 Hilton Highway contains industrial and trade based activities which are suitable given their low transport characteristics and frontage with State Highway. An Industrial L zoning whilst a 'spot zone' would be more appropriate than the current Residential 1 zone. Care would be needed in crafting district plan provisions for the residential interface and landscaping. Accordingly, an Industrial L zone would be more appropriate than the current Residential zone. A commercial (retail) type zone would be inappropriate in terms of wider town centre consolidation aims and likely traffic generation.

Recommendation **accept in part** for 16 Hilton Highway only.

Sub 57.1 Harvey Norman have sought that the land at 226 Evans Street, Timaru is *rezoned from Industrial L to Commercial to reflect existing land uses and to be consistent with the resource consent to granted in 2014 to extend commercial activities within the site*

The area of Industrial L is some 5ha. The majority of the Industrial L zone is not built out, but characterised by logistics, with Harvey Norman having a modest presence on north eastern corner. PGC Wrightson are located on southern frontage corner with access on to State Highway 1. Car parking for Harvey Norman is separate from the remainder of block. Consent No. 102.2014.147 provided consent for the expansion of the existing Harvey Norman from 3,300 to 6,530m². The existing 3,300m² of Harvey Norman is inclusive of its 1,000m² warehouse facility. Consent 102.2014.147 limits activities to activities permitted in the Industrial L zone. Consent was a non-complying activity as it extended onto the Residential zone.

Accordingly, the statement in the submission that:

“The land use character of “Area E” has overtime, become “incompatible” with its underlying Industrial zone. “Area E” is, for all intents and purposes, a commercial and large format retail precinct, and is likely to remain so indefinitely. It is therefore logical that the District Plan Review should re-zone “Area E” to a commercial zone to reflect its existing and consented issues” is not agreed with.

Given: the existing land use pattern and presence of logistics and distribution activities; the established Harvey Norman and associated storage area; that medium and long term demands for retail provision can be met as outlined by Property Economics (**Attachment A**); and the consolidation approach of the CRPS and the Strategic Directions of the DGMS, the relief is recommended to be **rejected**.

Submission 5.1 from Timaru District Holdings Ltd seek that the Commercial 2A zone at the Showgrounds site also be used for Industrial activities in conjunction with the Large Format Retail activities permitted under the operative District Plan.

Property Economics (**Attachment A**) have identified that there is a surplus of retail floorspace to meet medium term demands to 2028. Between 2028 to 2048, Property Economics advise a shortfall of some 7.0ha of land.

The Commercial 2A Large Format Store (Retail Park) zone provides unbuilt and surplus zoned commercial land of some 12ha. Under the operative plan, the site permits Retail >500m², and restaurants and trade suppliers. Provisions in the operative plan provide for the sequential release of general merchandise up to 34,000m²GFA by 2027. All other activities not otherwise specified (including Light Industrial) are Non-Complying (under rule D3-5.3).

Accordingly, there is some utility in being able to accommodate compatible lighter industrial uses within the showgrounds site. However, given the recommendations from Property Economics such industrial activities should not reduce capacity to meet long term projected retail demand, or generate reverse sensitivity effects on the primary public retail purpose of the Commercial 2A zone.

Accordingly, the submission is recommended to be **accepted in part**. Options for the replacement District Plan to consider in achieving such an outcome are to:

- (1) amend the operative ODP within the replacement District Plan to provide for Industrial opportunities in a limited area not exceeding 5ha;
- (2) amend the status in the replacement District Plan from non-complying to restricted discretionary for Industrial activities, but limiting such activities where these would result in substantial up-take of land or result in reverse sensitivity effects.
- (3) Permit wholesale, warehouse and distribution activities with additional urban design and amenity requirements.

Sub 44 and 45, PSE Properties el and Juice Products et al seek rezoning of that part of the current site zoned Lot 2 2 DP 402105, Lot 2 and Lot 4 DP 365071 from Rural 3 to Industrial H. The submission acknowledges that the site is subject to inundation. The submission is recommended to be **rejected** as set out in Attachment E:3 for reasons relating to having more than sufficient industrially zoned

land to meet long term demand, and hazard risks associated with the site. As advised by the Canterbury Regional Council:

“This area subject to a range of natural hazards. The area is close to an eroding coastline which will reach it well within building consent timeframes. There is coastal inundation risk. Development at this location will also impede freshwater drainage and flood flow paths as drainage and floodwater from the land to the north has to travel through this area, into the lagoon, and out to sea via the only available outlet on this stretch of coastline. Environment Canterbury would recommend against any development at this location”.

7.0 Rural Residential

The demand for Rural Residential opportunities is addressed in Section 4. That section of this report identifies that there are sufficient opportunities identified in the DGMS based on household projections (Property Economics, Attachment A).

Rural Residential density is addressed in Section 4.5.

7.1 Strategic Directions

The themes within the DGMS for Rural Residential activities are woven within:

- Strategic Direction [3] relating to settlement patterns and urban form which seeks that future growth is primary accommodated within existing settlements to strengthen compact patterns of development;
- Strategy Direction [9] Rural which seeks to manage subdivision use and development of rural land to reflect rural amenity values and avoid reverse sensitivity effects.
- Rural directive 2 which seeks to “*Limit opportunities for rural living opportunities, except as provided for through rural residential areas...*” ; and
- Residential Directive 1 which seeks to:

Provide for housing development necessary to meet the future housing demand of the District and reinforce compact urban forms through:

- *consolidating the existing urban settlements of Timaru, Temuka, Geraldine and Pleasant Point,*
- *limiting rural residential developments:*
 - *to identified locations; and*
 - *in a way and at a rate that is subservient to consolidating existing settlements through intensification and greenfield residential opportunities;*

Submissions have not sought to alter the approach, or have specified alternative wording. There are submissions that support the proposed rezoning⁴⁰. These are noted.

Matters related to a directive zoning approach or continuation of a dispersed model are addressed at Section 2.1.4.

7.2 Matters of Support

Section 2.1.4 outlines the overall approach to Rural Residential development in the DGMS, including overall support for the targeted zoned approach.

7.3 Matters of Objection

Residual matters of objection relate to:

⁴⁰ Sub 60.1 Ellery, Sub 13.1 Robertson

Additional rezoning requests as follows:

- Submission 16.2 BJ and JEM O’Keefe et al – Woodbury
- Submission 26.1 82 Smart Road, Pleasant Point Manse Road
- Submission 28.1 Hay – Pleasant Point
- Submission 30.2 White – Geraldine
- Submission 64.2 Gleniti North - Timaru

Submissions opposing rural residential rezoning include:

- Submission 31.4

7.3.1 Micro Rezoning Requests

These submissions are also specifically addressed in Attachment E:4.

These submissions should also be considered against the household projections in Section 3 and the Rural Residential demand projections in Section 4.5.

Submission 16.3, 16.4 and 16.5 BJ and JEM O’Keefe seek a rural residential rezoning. Sites are zoned Rural 1 and located between Woodbury (zoned Residential 3) and Recreation 3 zone. Sites range in size from 2.5ha to 4.0ha as fee simple, but all under one ownership (O’Keefe). The closest urban settlement is Geraldine (7.0km as the crow flies). A Cricket pitch and recreation centre are located immediately to the east, there is a school to the south (across Woodbury Road). Rural character predominates on the properties and to the north east (expansive pastoral), although smaller rural lifestyle properties are located to the north.

At a **macro level**, sites display some rural residential character but functions as a productive rural area. Approach would not be consistent, but is not considered contrary with **CRPS Policy 5.3.1**. A rural residential rezoning would not be in a form that provides a co-ordinated pattern of development (absence of services to support community of interest) and substantial distance from Geraldine. However, such a rezoning would be attached to an existing (but un-serviced urban area, as it is understood that only a rural water scheme is available in Woodbury).

Rezoning this site would be difficult to distinguish between many others in the district, and could lead to expectations to rezone other similar sites. Rezoning this site is also considered less appropriate in terms of providing for the quantum for rural residential development given: demand (Section 4.5) and the availability of other sites (including submissions) in fringe locations that are located closer to urban settlements.

At a **micro level** the site is bordered by residential to the west, and recreation (cricket ground) to the east. Accordingly there are less concerns relating to fragmenting productive rural land (**CRPS Policy 5.3.2(1)(c)**) and **Policy 5.3.12(1)(a)**, and incompatible activities on the **boundaries (Policy 5.3.12(1)(b))**.

Overall, a rezoning to rural residential is considered less appropriate than retention of the current rural zoning in terms of **CRPS Policy 5.3.1** given: the distance to a substantial urban settlement; current rural amenity and productive capacity; and limited ability to distinguish from other requests. Recommendation is to **reject** the submission noting that there is some merit associated with the proposal.

Sub 26.1 J Scott seek a rural residential zoning for the current Rural 1 zoned site adjoining the proposed DGMS Manse Road rural residential area. The submission states that new rural residential zone adjoining Manse Road, should follow land boundaries to include all the land between Manse Road, Smart Munro Road and a paper Road joining the two roads.

At a macro level additional Rural Residential zoning is considered inappropriate given the updated NZS2017 projections, and indeed the reduction in projected household demand for Pleasant Point (refer Figure 11) and consultation version of the DGMS which provides an eastern Manse Road option to meet rural residential demand in and around Pleasant Point. Additional zoning is less appropriate in terms of achieving consolidation outcomes given reduced projections, therefore inconsistent with **CRPS Objective 5.2.1**.

At a micro level, there is some potential for reverse sensitivity effects, and slightly less (relative to Manse east) access to the Pleasant Point urban area.

Recommendation **reject**.

Submission 28.1 R Hay, seeks the rezoning of 101 Te Ngawai Road Pleasant Point from Rural 1 to Rural Residential. Whilst the site is only 1.6ha, it is identified by the Canterbury Regional Council as being subject to inundation, meaning that rezoning for more intensive uses would be inappropriate. In reality, a rural residential amenity is already present, but with rural zoning provisions. A stand-alone zoning would act as a spot zone (Section 18A RMA), and would be difficult to distinguish from other sites.

CRPS Objective 11.2.1 and **11.3.1** and **11.3.2** Seeks to 'avoid' new subdivision, use and development that increases risks associated with Natural Hazards. Approach would also be contrary to Strategic Direction [4] Building resilient communities which seeks to avoid development in high hazard areas where risk from natural hazards is assessed as unacceptable.

Recommendation **reject**.

Submission 74.1 S Hilton seeks a rural residential zoning for a 7.5ha property, legal description Pt Lot DP5504 immediately north of the Pleasant Point primary school. The site description and assessment is provided in Attachment E-4. Environment Canterbury have advised that majority of the property meets the criteria for being described as prone to high hazard flooding with depths exceeding one metre comfortably in the 200 year ARI flood for the vast majority of the property. The rezoning is considered to be inconsistent to **CRPS Objective 11.2.1** and **Policy 11.3.1**. Whilst the rezoning would be attached to an existing urban settlement, given the extent of residential supply, and rural residential proposed at Manse Road, rezoning of this site as well would not assist in achieving consolidated development as sought by **CRPS Objective 5.2.1**. Rezoning to rural residential would not give effect to the RPS overall.

Recommendation **reject**.

Submission 30.2 from **A White** seeks that 120 Cox Street be rezoned immediately for rural residential development. The DGMS identifies that this area is not an inappropriate site for long term rural residential development as it is identified as Deferred South Terrace Rural Residential. Releasing for rezoning now would not be an efficient use of resources, nor assist in consolidated and coordinated development patterns (**CRPS Objective 5.2.1** and **Policy 5.3.1**). The site is less appropriate than Main North East / Templer Street Rural Residential in terms of staging release.

Recommendation **reject**.

Submission 64.2 Brosnahan et al, support the “Council’s recommendation to rezone this area for Rural Residential development, however based on Council’s linear interpolation of Statistics NZ data and the significant household peak prior to 2043, we request adoption of the Gleniti Road residential option...” (pg 8).

The submission then seeks a ‘deferred residential zoning’ on the Rural Residential zoning of a 10.5ha component of the proposed Gleniti North Rural Residential area. The deferment to prevent residential development is submitted to be uplifted on **1 January 2019**. The basis of the submission is that the GMS has not provided sufficient growth for the residential market, but extends to identifying a shortfall of rural residential opportunities.

The matters of relevance identified in the submission are:

The submitter requested properties be rezoned in accordance with the Rural Residential 'Gleniti North' Growth option, with a deferred Residential overlay being the 'Gleniti Road' Residential Growth option, with a deferred zoning commencement date of 1 January 2019 (i.e. immediately after the short-term 2013-2018 projection) for the following reasons:

- *The predicted residential growth in Timaru artificially high and less land is needed for residential.*
- *The predicted rural residential growth in Timaru artificially low and more land is needed for rural residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Districts beyond South Canterbury offering extensive options for greenfield residential and rural residential development.*
- *The ease of servicing the land.*
- *The land is close to existing settlement area.*

Indicatively, some 70 – 100 residential allotments could be provided on the 10.5ha site.

Section 3.2 of this report identified there is not a shortfall of residential capacity in Timaru settlement to meet residential demands in the short and long term.

The peak demand at in 2028 for 588 household units can be met subject to the existing capacity of for 677 households, in conjunction with increased levels of intensification. Accordingly, based on sufficient supply, this option is recommended to be rejected as inconsistent to **CRPS Objective 5.2.1** and **Policy 5.3.1** given that these provisions seek to consolidate existing urban areas.

The proposed relief would be consistent with those aspects of **CRP Policy 5.3.1** which seek that additional urban growth is attached to existing urban areas.

Regardless, a deferment to 2019 is not appropriate given any potential would not be needed until the medium term (2028) if at all, and then if only to meet peak demand. By the time the

replacement TDP Plan is operative it will be post 2019, hence relief is for a residential zone without deferment.

It is considered that the residential relief is likely to be inconsistent with **CRPS Objective 5.2.1** and **Policy 5.3.1** and the consolidation and coordinated development approach inherent in those provisions, given the NZS2017 projections (Property Economics, Attachment A).

The Council's Infrastructure Team have advised that there are efficiency issues in terms of wastewater servicing, although water can be provided by extension to the Gleniti High Zone Urban main. Accordingly, compared to other residential sites examined in the options report, this site scored less well in terms of infrastructure efficiency, and is considered less appropriate in terms of **CRPS Policy 5.3.2(3)(a)** which seeks that land use integrates with:

(a) The efficient and effective provision, maintenance or upgrade of infrastructure.

However, if the Panel are of a view that residential demand is needed to meet residential demand, it is noted that this site scores relatively well within the Options Report for Residential development options (pg 34) but did not make the short list to be further evaluated (pg 35), primarily as a consequence of integration with infrastructure.

Recommendation: Reject relief and retain proposed Rural Residential.

8.0 Transport

The integration of transport and land use is an important driver in the DGMS. This stems from the **Canterbury Regional Policy Statement** approach seeking to

- (1) provide a safe, efficient and effective transport system to meet transport needs, which: supports consolidated settlements; manages adverse effects; provides acceptable accessibility; and is consistent with the regional roading hierarchy (**Objective 5.2.3**);
- (2) Integrate land use and transport planning to promote modal choice; reduce the demand for transport; and avoid conflicts with incompatible activities (**Policy 5.3.8**); and
- (3) Avoid development with affects the safe, efficient and effective functioning of the land transport network (**Policy 5.3.7**).

Timaru District Council is also obliged to undertake its roading obligations, infrastructure planning and development as consistent with its Infrastructure Strategy⁴¹ as pursuant to s101B of the Local Government Act.

A number of transport submissions are more appropriately addressed in terms of the Council's functions and day-day operations associated with the Infrastructure Strategy obligations. Those submissions are acknowledged, but recommended to be **rejected** in terms of the GMS. The submissions are:

- **Sub 4.5** (Larsen) SD8 - Roding status in Temuka are not good with road damage on main road and intersections. Better roding formation is needed to avoid damage
- **Sub 7.4** (Eggeling). Would like to see the 50kph zone decreased on Pages Road, Timaru from 254 Pages Road through to 377-383 Pages Road due to the danger of a pending accident.
- **Sub 7.5** (Eggeling). Would like the kerb and channel be established on Pages Road, Timaru to the area of 377-383 Pages Road especially on the town side of the road.
- **Sub 18.2** (Rolling Ridge). Would like to see the 80kph zone decreased to 50kph on Pages Road, Timaru where residential use is due to the danger of a pending accident at the intersection of Hunter Hills Drive.
- **Sub 30.4** (A White). Footpath is critical to locals and tourists. Would like footpath be provided outside the 100km on Cox St.

Transport themes in the DGMS are provided in Strategic Direction [7] Transport:

To promote an effective, efficient and safe transport system that integrates with land use and growth, and promotes community prosperity through improving connectivity and accessibility.

Many submissions support this direction of the DGMS. Residual transport submissions include:

- Improving amenity and natural assets as the highest priority for Transport (**Sub 3.2 CBD Investment Group**);
- Providing an alternative route for freight around smaller towns (**Sub 6.7 Thomson**); to the Port (**Sub 25.12 Federated Farmers**); or the lack of connectivity due to State Highway 1 (**Sub 29.5**).
- Facilitating improvements in the use of public transport (**Sub 10.9 F Ross, Sub 22.8 N Gilkison**).

⁴¹ Timaru District Council Infrastructure Strategy 2015 – 2045. (Section 2.2)

- Improvements to walking and cycling connections to schools (**Sub 42.2 and 42.3, Ministry of Education**); and
- Miscellaneous amendments to the Directives (**Sub 40.2, 40.3 NZTA**), and adding specific agencies as supporting agencies in the Actions Table (A.6).

8.1 Strategic Directions

There are no specific amendments sought to Strategic Direction [7] Transport.

8.2 Matters of Support

Both Kiwirail (**Sub 34.1**) and NZTA (**Sub 40.1**) support the Strategic Directions, albeit with specific relief.

8.3 Matters of Objection

8.3.1 Improving amenity and natural assets

Submission 3.2 CBD Investment Group. Improving amenity and natural assets as these relate to the land transport network is a matter ultimately subservient to the functional purpose of that network. For the road transport system, this relates to the place of a road corridor within the roading hierarchy. Hence this submission is recommended to be **rejected**.

The highest classified roads (major arterials) provide for the greatest level of movement with a minimum access function. Typically, amenity and character is derived by the movement priority. For local roads there is relatively little through movement, with priority being property access and amenity. In this way the hierarchical network provides for the efficient and safe movement of people and goods, accounting for the anticipated amenity of adjoining areas.

8.3.2 Alternative Transport routes

It is understood that there is no planned works to provide for alternative transport routes associated with Orari (**Sub 6.7 Thomson**); or for alternative freight routes to the Port (**Sub 25.12 Federated Farmers**). It is understood that alternative Port access investigations and improved public access to the waterfront are regularly considered by relevant Agencies including Council.

Accordingly, these submissions are recommended as being **rejected**.

In terms of improved connectivity over the State Highway within Timaru township (**Sub 29.5 Henderson**), these matters are acknowledged by both the TDC and NZTA and are regularly considered in terms of National Land Transport funding. It is understood that works in Washdyke are still on the National Land Transport Fund list of potential projects, although improved access has not been confirmed in terms of funding priority. Factory Road Bridge widening works were financed in the 2016/2017 financial year and received National Land Transport Funding.

Accordingly, **Sub 29.5 Henderson** is accepted in part.

8.3.2 Facilitating Improvements in terms of public transport

Facilitating modal choice and improved use of public transport is a matter sought by **CRPS Policy 5.3.8**. Methods to implement that provision require TDC to set out objectives, policies and/or methods in district plans which:

- *promote transport modes which have low adverse environmental effects.*
- *Engage with developers to promote accessibility and modal choice for substantial developments.*

The DGMS seeks to implement these measures in several ways. Transport Directive 5 states:

Transport 5: *Encourage as appropriate, settlement patterns and infrastructure that promote transport choice options, recognising that where access to activities cannot be made effectively, efficiently or safely by other transport modes, trips will continue to be made by private vehicle.*

Both Action A7.3 and A7.7 seek to facilitate transport funding, planning and marketing for opportunities for public passenger transport, and the promotion of active transport modes.

Accordingly, the following submissions are recommended to be **accepted**, but that amendments to the GMS are not required. **Sub 10.9 F Ross, Sub 22.8 N Gilkison**. To account for the submissions from (**Sub 42.2 and 42.3**), Ministry of Education, which are recommended to be **accepted in part** – the Ministry for Education has been added as a support agency to Action 7.7 which seeks to prioritise and fund opportunities for active transport modes (which would be inclusive of walking and cycling opportunities to Schools).

8.3.3 Miscellaneous amendments to the Directions and amendments to Table 9.

NZTA Submission 40.2 and 40.3 seek amendments to the following:

- Amendment Transport Directive No.3 to include reference to the need to manage and where appropriate avoid incompatible activities around the transport network.

It is considered that submission Sub 40.3 be **accepted in part**. Directive Infrastructure No. 5 already recognises the need to broadly protect all 'strategic infrastructure' from incompatible and sensitive activities.

The submission relief from NZTA for Transport Directive No.3 would, it is considered, inappropriately extend the recognition inherent in Infrastructure Directive No.5 to the entire transport network. Such an approach would be inappropriately broad, as more localised network serve a place-setting function, not a strategic transport role, as described above. Strategic infrastructure as defined (Glossary) includes, '(a) Strategic land transport network and arterial roads'.

The relief requested by NZTA would be more appropriately targeted through amendment to Transport Directive No.3 as follows:

Transport 3: *Manage potential adverse effects from the operation and development of the transport network and infrastructure including the State Highway, Rail, Timaru Airport and the Port of Timaru; whilst managing and avoiding as appropriate, the development of incompatible and sensitive activities adjoining the strategic land transport network.*

- Amendments seeking to delete reference in Directive 5 to the recognition that some trips will continue to be made by private vehicles is recommended to be **rejected**. Given the expansive and low-density nature of Timaru’s settlements, modest growth and ability to facilitate considerable changes to other transport modes, this text is considered a statement of fact.
- Reference to the One Network Roding Classification in the text of E:2.7 is recommended be **accepted** on the basis of consistency with a national approach to the road classification.

9.0 Infrastructure

As with transport, the GMS role of integrating infrastructure and land use receives considerable direction from the Canterbury Regional Policy Statement, and the asset management and provision role of the TDC Infrastructure Strategy (as identified in Section 8.0).

The **Canterbury Regional Policy Statement** approach as to directing a consolidated urban approach, and integration of land use and infrastructure is summarised in the principles reasons for **Objective 5.2.1**:

A consolidated pattern of urban development, as the primary focus for accommodating the region's growth, together with a limitation on the extent of areas of rural-residential activity, will:

1. minimise energy use;
2. promote more sustainable forms of development;
3. encourage greater modal choice, reduced trip distances and promote healthier transport options;
4. provide for the efficient use of existing infrastructure;...

The integration of land use and infrastructure is the pervading theme, and title for Chapter 5 of the CRPS(2013). Relevant provisions require:

- (1) Development is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure (**Objective 5.2.1(2)(f)**), and that adverse effects on significant infrastructure is to be avoided where practicable (**Objective 5.2.1(2)(g)**);
- (2) The benefits of regionally significant infrastructure is to be recognised (**Objective 5.2.2(1)**); and
- (3) To achieve patterns and sequencing of land-use with regionally significant infrastructure in the wider region so that:
 - (a) development does not result in adverse effects on the operation, use and development of regionally significant infrastructure.
 - (b) adverse effects resulting from the development or operation of regionally significant infrastructure are avoided, remedied or mitigated as fully as practicable.
 - (c) there is increased sustainability, efficiency and liveability. (**Objective 5.2.2(2)**)
- (4) To enable development, which:

Integrates with: the efficient and effective provision, maintenance or upgrade of infrastructure. (**Policy 5.3.2**)
- (5) Ensure development is appropriately and efficiently served for the collection, treatment, disposal or re-use of sewage and stormwater, including avoiding development which will not be served in a timely manner (**Policy 5.3.5**); and
- (6) For sewage and stormwater and potable water infrastructure, 'discourage sewerage, stormwater and potable water supply infrastructure which will promote development in locations which do not meet Policy 5.3.1'. (**Policy 5.3.6(3)**).

The themes within the DGMS for Infrastructure are provided in Strategic Direction [8] Infrastructure as below. That Strategy Direction restates Section 4.1 of the Timaru District Council Infrastructure Strategy (2015 – 2045).

To promote highly liveable communities and land use with efficiently and effectively integrated infrastructure by:

(i) recognising and protecting, including from reverse sensitivity effects, the role, function and development of strategic infrastructure; and

(ii) ensuring that infrastructure and land use patterns are aligned to achieve sustainability, efficiency and liveability by:

- a. Investing in Community – through advocating, promoting and requiring necessary infrastructure solutions;*
- b. Promoting integrated communities – through successful planning and provision of necessary and critical infrastructure;*
- c. Supporting areas of economic strength – through long term planning and supply of appropriate infrastructure and capacity to meet required commercial and industrial needs.*
- d. Ensure critical infrastructure meets future needs – through the provision of resilient infrastructure and the necessary renewal of existing infrastructure.*

Submissions support this direction the DGMS.

As with submissions on Section 8 Transport, there are submissions more appropriately addressed in terms of the Council's functions and day-to-day operations associated with Local Government Act 2002 and Infrastructure Strategy obligations.

Those submissions are acknowledged, but recommended to be **rejected** in terms of the GMS. The submissions are:

- **Sub 32.1 Al Young et al.** Geraldine area five community drinking water zones. Shallow bores need to be deepened to below the 30m threshold to maintain good water quality, and considerably reduce the restriction zone placed on landowners.
- **Sub 3.3. CBD Investment Group.** Consider there is a lack of infrastructure.
- **Sub 14.4. SD Barclay.** The difficulty of providing sewerage can be overcome by the use of step systems or maceration pumps without major mains.
- **Sub 21.2 Insights.** Seeking full infrastructure costs recovery from developers will compromise development economics. Council will need to adopt a more proactive approach to bring more public sector funding to co-invest and finance initial costs of infrastructure trunk expansion.
- **Sub 30.5 A White.** On-going assessment with infrastructure demand is required with the growing population and tourists.
- **Sub 54.3 Milward et al.** Historically, there has been a disconnection between Industrial land rezoning and the provision of relevant services. Such disconnection has resulted in development frustrations for both potential purchasers and developers.
- **Sub 38.2 Alpine Energy.** The issue raised is the potential disconnect between purchases of a subdivided lot often being unaware that they may have to pay for a connection to the electrical network. It is considered that this matter is best addressed through a note in the replacement District Plan.

Residual themes include:

- The need to match residential intensification with supporting infrastructure (**Sub 11.1 Frank**); facilitating development into areas in accordance with the GMS (**Sub 21.4 Insights**) including consideration given to improving water quality (**Sub 11.10 Frank**).
- Consideration of infrastructure upgrades should address environmental issues. Accordingly, requests Infrastructure Directive 6 on page 58 of the Strategy to be reworded. (**Sub 20.3 CRC**).

- Amend Directive 5 so that the requirement to protect strategic infrastructure from incompatible activities is limited to directives associated with National Policy Statements, or other directives (**Sub 25.13 Federated Farmers**).
- Requirements of Council to provide low pressure sewer mains to service rural residential zones (**Sub 62.2 DA Coupland**).

9.1 Strategic Directions

There are no specific amendments sought to Strategic Direction [8] Infrastructure.

9.2 Matters of Support

Apart from the specific matters identified below, there is general support for the Infrastructure Strategic Direction, associated Directives, and Actions.

9.3 Matters of Objection

9.3.1 Match residential intensification with supporting infrastructure

H Frank (**Sub 11.1 and 11.10**), Alpine Energy in terms of infill housing (**Sub 38**), and Insights (**Sub 21.4**) consider there is a broader need for a partnership approach to facilitating development into areas identified in the strategy.

The GMS has acknowledged these matters in terms of Action 10.9 which seeks to develop a programme of measures associated with residential intensification areas, including necessary infrastructure support (such as increased stormwater loadings). These submissions are **accepted**, however amendments to the GMS are not considered necessary. It is noted that mechanisms such as working with supporting agencies (such as Alpine Energy, refer Action 8.5) are identified throughout the GMS.

9.3.2 Infrastructure replacement or upgrades to improve the Environment

This submission from the Canterbury Regional Council (Sub 20.3) seeks amendments to Directive 6:

*Manage the adverse effects from infrastructure on the environment, including avoiding further ~~such~~ adverse effects on significant natural and cultural values ~~where practicable~~, **and when renewing infrastructure or designing new infrastructure promote improved environmental outcomes wherever practicable.***

The submission states that whilst the Strategy is not the key document for achieving environment outcomes, it is designed to provide for the framework for the Council's other planning documents. I note that CRPS(2013) **Objective 5.2.1(2)(a)** seeks that development:

"maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values".

I note that the definition of ‘practicable’ means *feasible* as well as *usable*, and able to be done or put into practise *successfully*⁴².

Application of what could constitute as ‘practicable’ infrastructure renewal or design in determining to promote improved environmental outcomes requires consideration of the merits of the proposal.

It is considered that the submission be accepted in part. The principle of the relief is agreed, however additional text is needed so as to be explicit as to the basis of the consideration of what may constitute an appropriate alternative given the wording utilised in Objective CRPS **Objective 5.2.1(2)(a)**. Accordingly, Directive 5 is recommended to be reworded as:

*Manage the adverse effects from infrastructure on the environment, including avoiding further ~~such~~ adverse effects on significant natural and cultural values where practicable; **and when designing new infrastructure maintain, and where appropriate enhance the overall natural environment having regard to the efficiency and effectiveness of infrastructure renewal or design.***

9.3.3 Compliance with the NPS and NES for Infrastructure

The concern raised in submission **Sub 25.13 Federated Farmers** is that provision for transmission buffers required to implement the NPS and NESET may be artificially extended to incorporate local distribution networks. Within the Canterbury Regional Policy Statement both transmission (national / regional) and distribution (regional / local) networks have been defined as Strategic Infrastructure. This has lead in the Christchurch Plan to buffers and regulation also applying to the distribution networks. This matter is acknowledged and will need to be carefully evaluated in the replacement District Plan and associated Section 32.

The relief recommends explicit addition of ‘requirements of any National Policy Statement or other directive’ into Infrastructure Directive 5 as this relates to incompatibilities of land use from strategic infrastructure. The current directive aligns with **CRPS Objective 5.2.2**, NPS and NESET and is not recommended to be amended. Accordingly, this submission is recommended to be **rejected**.

9.3.4 Council consider provision of low pressure sewer mains for rural residential zones

Sub 62 (DA Coupland) relates to the DGMS Kelland’s Heights Rural Residential option. The submission seeks that Council provide low pressure sewer mains to service rural residential zones. Council’s Infrastructure Team (Attachment F) have identified that whilst servicing could be effective, it may not be efficient.

CRPS Policy 5.3.1 refers to the ability for rural residential developments to be efficiently serviced. This does not provide a default position for public services to be provided to rural residential zones. Ultimately, the DGMS repeatedly identifies that public infrastructure should not be anticipated. The submission (**Sub 62.2**) is recommended to be **rejected**.

⁴² Oxford Dictionary.

10.0 Landscape and Natural Areas

The approach to Landscapes and Natural Areas in the DGMS is generally supported. The main themes received in submissions are:

- Agreement as to the approach.
- The importance of consultation in terms of requiring esplanade reserves or strips.
- Protection of landscapes and natural areas.

The statutory foundation within the DGMS for these topics is:

- **Natural Areas.** The Resource Management Act (1991), New Zealand Coastal Policy Statement and requirements of the CRPS and Regional Plans which identifies the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as a matter of national importance. Ultimately, there are requirements for the identification and protection of significant indigenous biodiversity and ecosystems, and obligations relating to wetlands, waterways and riparian areas.
- **Landscapes.** The Resource Management Act (1991), New Zealand Coastal Policy Statement and requirements of the CRPS and Regional Plans which identifies, as a matter of national importance:
 - The preservation of the natural character of the coastal environment, wetlands, lakes, and rivers and their margins from inappropriate subdivision, use, and development; and
 - protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development.

These requirements extend to consideration of other important landscapes, including for their natural character, historic cultural, or historic heritage values, and amenity values.

Submissions that either support the provisions of the DGMS, provide statements rather than seek relief, or raise matters addressed under the LTP are as below. These matters are acknowledged, but not considered further.

- **Sub 10.6 F Ross.** Landscapes and natural features and production land need to be retained and protected from developments.
- **Sub 10.7 F Ross.** Existing settlements and urban form be retained and urge new buildings to blend in with existing patterns.
- **Sub 10.10. F Ross.** Very important to keep the open spaces to retain the views to outstanding landscapes in the District.
- **Sub 11.7 H Frank.** Strategic Direction 9 – Rural. Strongly agree, especially support "*maintain or enhance areas or features of cultural, historical, landscape or ecological value*"
- **Sub 22.3 N Gilkison.** In addition, there should be a focus on identifying, cleaning up and managing degraded natural habitats.
- **Sub 22.6 N Gilkison.** To be sustainable, it is critical that the natural environment is not adversely impacted by developments.
- **Sub 22.9 N Gilkison.** Also need to ensure the function and quality of open spaces are key design elements.

- **Sub 12.5 T Titheridge.** As long as sufficient green spaces are provided for and urban planning will cope to demands. In addition, the Timaru District Council Parks Strategy (2012 – 2022) manages this matter.

Residual matters raised in submissions include:

- Amendments to Strategic Direction [2] to introduce an element of practicability to amenity and design improvements (**KiwiRail Sub 34.2**); and
- Discretion, communication with rural landowners and responsibilities for access in relation to natural values and landscapes (**Federated Farmers Sub 25.7**).
- The need to reference heritage and cultural landscapes (**Heritage New Zealand Sub 53.2**).

10.1 Strategic Directions

KiwiRail Sub 34.2 seek the addition of some ‘practicality’ to Strategic Direction 2 as below.

To manage subdivision and land use development to:

(i) recognise and protect outstanding natural landscapes and natural areas in the district from inappropriate activities;

(ii) improve amenity and design particularly in urban areas where practicable;

And...

The basis of the relief is acknowledged; the wording is recommended as being **rejected**.

The Strategic Direction seeks a general improvement in amenity throughout the district. Amending the relief as sought would be too broad.

There are other, more specific provisions, such as Transport Directive 4 and Infrastructure Directive 4 that acknowledge the need to *provide for the safe, efficient, and effective development, upgrade, maintenance and operation of infrastructure* and the consequences this has in terms of environment expectations at the interface with the rail network. Accordingly, it is considered that the foundation sought in the relief is already present in the DGMS.

It is considered appropriate for the replacement District Plan to consider and establish provisions relating to sensitive activity setbacks, and noise and vibration controls from rail corridors.

Heritage New Zealand Sub 53.2 seek to include reference to ‘Heritage and Cultural landscapes’ within Strategic Direction 2.

The amendment sought to Strategic Direction [2] would read:

- (i) recognise and protect outstanding natural landscapes and natural areas, **and heritage and cultural landscapes** in the district from inappropriate activities;*

The relief states that these landscapes are also of benefit to Timaru District, including areas where there is a concentration of significant rock art sites.

The same reference is requested at DGMS page 34 'Landscape, Biodiversity and Amenity', and Action A2.1. For the latter, reference for additional Support Agencies, being Ngai Tahu Papatipu Rūnanga, Te Rūnanga o Arowhenua and Heritage New Zealand Pouhere Taonga is sought.

It is acknowledged that **CRPS Objective 13.2.1** provides a mandate to the Timaru District Council to recognise and provide for cultural and heritage values as expressed in a landscape setting.

CRPS Policy 12.3.3 seeks to implement that Objective by requiring the identification and management of important landscapes that are not outstanding natural landscapes, for natural character, historic cultural, historic heritage and amenity purposes. Importantly, **CRPS Policy 12.3.3** seeks to 'identify and manage' which is not as absolute as the need to 'recognise and provide for' outstanding natural landscapes (**CRPS Policy 12.3.2**). The implementation of **CRPS Policy 12.3.3** is that local authorities 'may' set out provisions in their district plans for the appropriate management of such landscapes.

Accordingly, the relief is recommended be accepted in part. There is a CRPS directive for heritage and cultural landscapes to be managed, but not necessarily protected. The amendment to Strategic Direction [2] would read:

- (ii) *recognise and protect outstanding natural landscapes and natural areas, in the district from inappropriate activities, **and otherwise manage activities within identified important heritage and cultural landscapes;***

10.2 Matters of Support

Attachment B registers acknowledgement of submissions that support these provisions.

10.3 Matters of Objection

10.3.1 Access and Partnership

Federated Farmers Sub 25.7 considers it disappointing that the strategy within E2.2 does not include co-operation with rural land holdings in terms of both recognition and provision of landscape and natural values, and access to these values.

This submission is recommended to be **accepted**, as whilst Table 3 is clear that there are a range of non-regulatory tools that should be utilised to protect landscape and natural values, the commitment and involvement of rural land holdings is a critical factor. Accordingly, 'Rural Landholders' is recommended to be inserted as a Support Agency for actions A2.1, A2.2, A2.3 and A2.4.

11.0 Miscellaneous Cultural and Community

There are a wide range of miscellaneous submissions that relate to a number of matters within the DGMS. I have attempted to group these in this Section of the Report, noting that the main categories are:

- Historic Heritage (E2.1 District Character)
- Iwi and Consultation (Section E2.5 Takata Whenua)
- Building resilient communities and natural hazards (Section E2.4)
- Rural character and amenity (Section E:2.9); and
- Community governance and consultation (Section E:2.12).

The approach outlined in these provisions of the DGMS is generally supported.

The statutory foundation within the DGMS for these topics are:

- **Historic Heritage.** The Resource Management Act (1991) and Canterbury Regional Policy Statement Chapter 13. Requirements stem from the need to protect historic heritage from inappropriate subdivision, use and development (RMA s6(f)); and the need to consider, identify and protect historic heritage according to the provisions of the CRPS. Importantly, much of Timaru CBD also has important heritage character and value which provides a distinct identify to Timaru and is of value.
- **Iwi and Consultation.** This matter is addressed in Section 2.1.3 of this report. In addition, throughout the Regional Policy Statement there are numerous directions to Council to consult with takata whenua and include provisions for the relationship between Ngāi Tahu, their culture and traditions, and their ancestral lands, water, sites, wāhi tapu and other taonga within the District Plan. Specific mention is made of papakāinga housing and marae as part of the CRPS landuse chapter (chapter 5).
- **Resilient Communities and Natural Hazards.** *‘The management of significant risks from natural hazards’* has been elevated to a matter of National importance in the Resource Legislation Amendment Act 2017. These matters also remain functions of both the Regional Council and Timaru District Council under section 30(c)(iv) and section 31(b)(i) respectively.

Throughout the Canterbury Regional Policy Statement there are numerous directions to the Council in relation to Natural Hazards. Specifically, Chapter 11 seeks that new subdivision use and development of land is to be avoided where it increases risks associated with natural hazards (**Objective 11.2.1**), with associated Policy (**11.3.1**) seeking avoidance of inappropriate development in identified high hazards areas.

In terms of natural hazard resilience, **CRPS Policy 11.3.8** seeks to ensure that particular regard is had to the effects of climate change.

Broader constructs related to resilience have a mandate founded in the provisions of the Local Government Act 2002 and Resource Management Act 1991 as these relate to governance and sustainability respectively.

- **Rural Character and amenity. Objective 5.2.1** of the CRPS seeks development which:
“enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which: (2)(e) enables rural activities that support the rural environment including primary production and (2)(i) avoids conflicts between incompatible activities.”

The explanation for the Objective states that that primary production from Canterbury’s rural areas is of significance to the economic and social well-being of Canterbury’s people and communities and that it is *foreseeable that the well-being of future generations will also be strongly influenced by the ability to continue with such primary production*. It states it is *important to manage resources and activities in rural areas so that the foreseeable potential of the rural primary base of Canterbury is maintained*.

CRPS Policy 5.3.12 is to implement **Objective 5.2.1**. The Policy seeks to maintain and enhance natural and physical resources contributing to Canterbury’s overall rural productive economy in areas which are valued for existing or foreseeable future primary production, including through:

- (a) avoiding development, and / or fragmentation that forecloses appropriate primary production or results in incompatible activities to primary production;
- (b) enable appropriate and compatible rural based tourism, employment and recreational development; and
- (c) avoid intensification where this would cumulatively adversely affect water quality and quantity.

The replacement District Plan is to *give effect* to these provisions for managing the rural land resource. They are foundation principles for this Section of the DGMS.

- **Community consultation and governance.** The principles and mandate for E:2.12 is set out in Section C:2.4 of the DGMS.

Submissions that either support these provisions of the DGMS, provide statements rather than seek relief, or raise matters addressed under the LTP are below. These matters are acknowledged, but not considered further.

- **Sub 7.3 C Eggeling.** Timaru is expanding at a great speed. Own development at Hunter Hills Drive and other recent developments proved this. Commend the Council for what they are trying to achieve.
- **Sub 10.5 F Ross.** Generally, agree with intensions of the directions and agree they are important matters to consider.
- **Sub 11.3 H Frank.** Strongly agree with these directions.
- **Sub 16.6 O’Keefe.** Agree there is an increase of aging group and consider these are to be adequately dealt with by the McKenzie Village development.
- **Sub 25.5 Federated Farmers.** Agree with the Directions overall and consider it is a pragmatic approach. The essential need for such pragmatism is the identification of an aging population for the District.
- **Sub 25.10 Federated Farmers.** Strategic Directions. Strongly agree, in particular support "(iii) the retention of the character and productive capacity of rural areas".
- **Sub 25.14 Federated Farmers.** Strongly agree with the collaborative approach of this process and is willing to further participate in the process.
- **Sub 29.4. H Henderson.** Agree with stopping ribbon development into productive farmland.
- **Sub 30.8 A White.** Great to know consultation approach is taken by Council.
- **Sub 38.1 Alpine Energy.** Overall support for the GMS and infill housing.

- **Sub 41.1 Community and Public Health.** The submitter supports the Strategy, in particular Strategic Directions 2, 4, 5, 7, 8, 10, 11.
- **Sub 4.3 H Larsen.** Would like to see more art works in public places.
- **Sub 11.9 H Frank.** Where the benefits are clearly related to one group, it should be reflected in the costs for this group. However, some costs cannot be allocated directly and will benefit the wider community.
- **Sub 12.12.** T Titheridge. Keep rates low in Geraldine.
- **Sub 29.7. H Henderson.** TDC to influence NZTA, ECan and SCDHB.

11.1 Strategic Directions

Federated Farmers (**Sub 25.9**) have raised an amendment to Strategic Direction [4] Building Resilient Communities.

Federated Farmers are concerned with the issue of economic resilience because of an aging population, where an increasing number of the District's population will be on fixed income, with little ability to contribute to the building of resilient communities.

The relief is:

To promote resilience into physical resources including infrastructure and housing, through:

- (i) *avoiding development in high hazard areas where the risk from natural hazards is assessed as being unacceptable, and otherwise managing development or intensification for other recognised hazards subject to a consideration of risk; and*
- (ii) *to encourage the provision of facilities, services and accessible transport options that respond to the changing social, recreational, civic and health demands of the district, **and are within the financial capacity of its citizens.***

The matter raised is one that will confront the Timaru District, along with all local authorities. The matter is rightly identified in the submission as an issue for the Council's LTP, and the Council is aware of the issue.

The basis for the Strategic Direction [4] in the DGMS is to ensure that those aspects of community building (such as the provision of swimming pools, libraries, parks and heritage retention initiatives) consider broader concepts in terms of how resilient, robust, reliable and able to adapt the asset is to cater for increasingly elderly populations. It is considered that the efficiency (cost) of providing the asset will already be at the forefront of setting the LTP. Accordingly, the submission is recommended be **rejected**.

There are no further specific submissions seeking amendment to the Strategic Directions.

11.2 Matters of Support

Matters of support are identified above. Attachment B responds to each submission point.

11.3 Matters of Objection

11.3.1 Iwi Consultation and Process

Sub 6.9 M Thompson. The submission acknowledges that consultation with the Runanga needs to take place as part of the process but considers that this should not add another layer of cost and compliance for landowners / business owners.

These matters are addressed in Section 2.1.3 of this report, and the amendments accepted based on submission 75 from Te Rūnanga o Arowhenua (below). Timaru District Council will undertake a number of actions to ensure that its statutory functions are complied with in this regard. It is noted that in addition to the existing Section 32 requirements of the Council in terms of its regulatory functions under the Resource Management Act 1991, the insertion of Section 18A further requires that Council processes and regulation is efficient and effective.

The submission is recommended to be **accepted in part**.

Sub 75 was received from Te Rūnanga o Arowhenua. That submission seeks amendments to:

- Section B:1 - to reference the 'Iwi Management Plan of Kati Huirapa for the Area Rakaia to Waitaki (1992);
- Section D:1 - provide an explicit reference to Te Rūnanga o Arowhenua as holding manawhenua for the Timaru District takiwa;
- Section E2:2 - acknowledge Te Rūnanga o Arowhenua as Support Agencies for A2.1 and A2.4.

These matters are not contentious and are relevant statements to include in the DGMS. The submissions are recommended to be **accepted** for the reasons stated in **Attachment B**.

11.3.2 Urban Encroachment

Sub 14.5 S Barclay. Disagrees with urban encroachment on prime rural farm land at the expense of utilising existing vacant residential land.

It is noted that sufficient residential land and housing choice is required to provide for projected growth. This ensures that there are not market distortions through an absence of an appropriate quantum of zoned land, but also that there is also a choice in locations and densities.

The DGMS seeks to ensure through a strategy of consolidation, as required by the CRPS. This is to be achieved through identified intensification areas; recognition that there is (apart from Geraldine) sufficient zoned residential land to provide for demand; and enable rural residential development to provide for that segment of the market. This approach minimises the encroachment onto rural farmland, but provides for such as needed to meet demands for rural residential living, and some modest industrial rezonings. The submission is recommended be **rejected**.

11.3.3 Resilience

In terms of the ability for the district to respond to Natural Hazard events, **Sub 10.11** (F Ross), **Sub 12.3** (T Titheridge) and **Sub 22.5** (N Gilkison) these matters are to be addressed in further detail in the replacement District Plan, but are signalled in Directive 3 'Building Resilient Communities':

Building Resilient Communities 3: *Avoid new subdivision, use and development where risks from natural hazards and the effects of climate change to people, property and infrastructure (excluding strategic infrastructure where there is no reasonable alternative) are assessed as unacceptable.*

The need to avoid areas subject to hazards associated with flood risk and sea level rise have also been acknowledged in terms of recommending that zoning requests be rejected at Washdyke (Sub 44, 45), Temuka (Sub 1, 14, 19 and 23) and Pleasant Point (Sub 74).

11.3.4 Governance

Submissions seeking a greater level of consultation with regard to the DGMS are recommended be rejected. The extensive consultation process for the DGMS is set out in Section 1.1.4⁴³.

Sub 4.6 H Larsen. The relief seeks a greater level of transparency with Council and clients. How much a consent costs and why it was granted should be made public information. It is understood that both section 95 (notification) and section 104 (substantive) consent decisions are able to be obtained from the Council by request, and could certainly not be refused subject to a LGIOMA request. It is also noted that the Timaru District Council identifies on its website notified resource consents: e.g. <https://www.timaru.govt.nz/news-and-events/latest-news/public-notice-bayhill>.

Additional transparency or publication is unnecessary.

Lastly, submission from I Geary (**Sub 9.1**) and H Henderson (**29.11**) seek to ensure that any perceived corruption or bias is removed from the process. The Local Government Act 2002 sets out a process around transparency of decision making. All records for the preparation of the GMS including background reports have been broadly consulted on. I am unsure as to whether this matter is specific to the DGMS or broader. In response I note that as the author I have no bias in terms of the matters considered. Furthermore, these matters will be considered by a Panel including an Independent Commissioner.

11.3.5 Heritage

The submission from **Heritage New Zealand Pouhere Taonga** overall supports the DGMS (Sub 53.1), albeit subject to specific amendments. Those amendments to Strategic Direction [2] relating to Heritage and Cultural landscapes have been recommended to be **accepted in part** in Section 10.1.

Heritage New Zealand also seek (**Sub 53.3**) to add to P.36 in right hand column - 'Promoting seismic strengthen of older building stock.' This matter is also the subject of the submission from T Titheridge (**Sub 12.4**). That submission is recommended to be accepted as such an approach can provide for the efficient use of existing physical resources in a district which promotes resilience.

Sub 53.4 from **Heritage New Zealand** seek a very explicit reference of the benefits of utilising heritage building stock. Whilst this matter is not disagreed with, it is too specific for a GMS. Accordingly, this matter is recommended to be **rejected**.

⁴³ Sub 22.10 / 22.11 N Gilkison, Sub 12.11 T Titheridge, Subs 46.1 South Canterbury Chamber of Commerce (noting that an extension was provided for a late submission from this party), Sub 70.4 Davis Ogilvie.

Sub 53.5 from **Heritage New Zealand** also seeks that the implementation Table for the District Plan be amended to include reference to the need to: *‘encourage and incentivise seismic strengthening of heritage buildings, adaptive re-use of older buildings, and inner city living’*. (DGMS pg 66). That submission is recommended to be **accepted in part** with two suggested amendments. Firstly, it is considered that the insertion is better placed in Table 2, Action A1.3 District Character (pg 44) which already addresses this matter and as the District’s heritage is not isolated to residential areas; secondly that the term incentivise is not recommended as this implies a funding basis from the Council for heritage retention, the extent of which is best considered under the LTP. Keeping the term ‘encourage’ is considered broad enough.

Lastly, **Sub 53.6** from **Heritage New Zealand** which seeks a detailed amendment to Section G1.1. is recommended to be rejected as it is too specific and focused for a general section on implementation.

12.0 Residential

The approach to Residential development is generally supported in the DGMS, although there are some matters of dispute. These matters relate to:

- The capacity for accommodating residential development in the zoned areas of Timaru is overstated.
- The Hornbrook Reserve area in Temuka and whether this should be rezoned Residential.
- Provision of additional deferred Residential areas.
- Intensification around town centres should not occur, as TDC should favour growth in the suburbs.
- Rezoning requests such as:
 - 49, 63 and 73 Connolly Street, Geraldine.
 - 50m strip along Pages Road at Lot 3 DP 397906 and 279 & 295 Pages Road, Timaru to Residential 6
 - 9 Grant Street, Temuka (removal of deferment)

The statutory foundation for the provision of residential development within the DGMS has been previously stated in this report. The CRPS (2013) seeks that:

- **Objective 5.2.1.** Development is used to consolidate existing urban areas as the primary focus for accommodating the region's growth;
- **Policy 5.3.1.** Urban growth is to be of a form that concentrates, or is attached to, existing urban areas; promotes a coordinated pattern of development; and provides housing choice.
- **Policy 5.3.5.** Development is to be appropriately and efficiently served for the collection, treatment, disposal or re-use of sewage and stormwater, and the provision of potable water.
- **Policy 5.3.8.** Land use and transport is to be integrated, in a way that promotes modal choice.
- **Policy 5.3.12.** Canterbury's overall rural productive resources are to be maintained and enhanced, including avoiding development which forecloses the ability to make appropriate use of that land for primary production.
- **Policy 11.3.1.** New subdivision, use and development is to be avoided in areas in high hazard areas.

In summary, residential development should be pursued in a manner that consolidates existing urban areas, and promotes a consolidated pattern of development. Housing choice is to be promoted, in a manner that can be efficiently and effectively serviced by supporting infrastructure, and should promote modal choice. Lastly, residential development or intensification is to be avoided in high hazard areas.

Submissions that either: support these provisions of the DGMS; provide statements rather than seek relief; or raise matters better addressed by the Council's LTP functions are as below. These matters are acknowledged, but not considered further.

- **Sub 1.3. S Wolczuk.** The growth in Temuka needs to utilise empty land available as well as expand outside the settlement boundaries.

- **Sub 6.1 and Sub 6.3. M Thompson.** Agree in principle with the demand for residential expansion and the consolidation approach in Town centre.
- **Sub 6.5. M Thompson.** Retirement village type land use need to be provided to accommodate the aging population.
- **Sub 14.3 S Barclay.** Should firstly utilise existing vacant land before further encroachment into rural land.
- **Sub 22.8. N Gilkison.** The promotion of mixed use, walkable neighbourhood is a key element.

12.1 Strategic Directions

There are no specific matters raised in relation to Strategic Direction [10] Residential which states:

To:

(i) encourage opportunities for higher residential densities in close proximity to the Timaru and Geraldine town centres, and Highfield Village Mall; and

(ii) provide sufficient residential development capacity to meet demand and household choice as it arises.

With demand relating to the number of dwellings, and higher densities and services arising from an increasingly aging population; and household choice relating to a diversity of types households, range of price points including affordable housing options, and choice of locations.

12.2 Matters of Support

Specific matters of support are addressed above.

12.3 Matters of Objection

12.3.1 Capacity for accommodating residential development in zoned areas

A number of submitters have questioned whether the surveyed capacity for residential areas is feasible, unavailable or alternatively meets market demand. A number of these submissions have also sought additional rural residential rezonings.

- **Sub 21.3 Insights.** What if land owners do not make the land available? Alternatives need to be prepared should this be the case to release land for future growth.
- **Sub 39.1 P&L Batrum.** A lot of residential land in Pleasant Point is either not available or is not suitable for development.
- **Sub 65.1 Riverside Estates.** Predicted residential growth in Temuka is artificially low and more land is needed for residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC.
- **Sub 70.2. Davis Ogilvie.** It is unrealistic to consider the existing available in-fill areas and Greenfield areas can be developed within a reasonable timeframe to keep up with the demand. More Residential land is required.
- **Subs 36.1 RP Simmons; Sub 55.1 NA Walker; Sub 56.1 Levels Golfing Lifestyles; Subs 58.1 Clarebrook Farms Ltd; Sub 61.1 GW Craig et al; 63.1 ZJ Poplawski; Sub 64.1 AJ Brosnahan et al.** The predicted 62.4ha development capacity within Timaru settlement area is too

optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.

With regard to existing residential capacity within the urban settlements, I am reliant on the capacity analysis provided by the Timaru District Council in December 2016. Section 3.7 of this report identifies that Council Officers undertook the assessment of feasible residential capacity. That survey removed potential yield based on a consideration of: land tenure, site shape and topography; and use. It also did not consider any additional capacity that could be made available through the further subdivision or intensification of sites with an existing dwelling. In this sense the assessment was quite conservative.

The submissions that have been received care of Milward Finlay Lobb raise a number of valid matters that increase the complexity as to developing residential land. These include:

- Land values, location and topography;
- Development costs including servicing;
- Sales prices;
- Capital investment, taxation and GST;
- Borrowing costs;
- Council development contributions;
- Reliance on downstream development to provide integrated servicing;
- External factors beyond Timaru, such as earthquakes and Government Policy.

It is considered that these factors are largely the same or similar in terms of incurring costs for the development of any residential property, rather than being a factor for where the market is being overly constrained.

The provision of additional land on the basis that land may be being land-banked is not prudent land use management, and furthermore the submission (**Sub 21.3 Insights**) does not provide any identification of the extent of such an issue.

Council cannot compel a landowner to develop, as this will come down to their preferences and the market. However, the Council cannot over supply residential capacity and provide infrastructure as this would be inefficient in terms of community assets. At present, in the residential sector there is a sufficient supply of land and multiple landowners so that the risk of this approach appears low.

An absence of residential supply would lead to market distortions, resulting in elevated residential sales prices. It was on that basis that A10.1 sets out the need for an annual Residential Land Register in the District, setting out vacancy, ownership, servicing levels, and likely pricing. Accordingly, and based on the survey information made available by the Timaru District Council I recommend that the submissions above be **rejected**.

12.3.2 Hornbrook Reserve Areas

The following submissions relate to areas in Temuka settlement sought to be rezoned from Recreation 2 to Residential to enable residential use.

- **Sub 1.1 S Wolczuk. Sub 4.1 H Larsen.** 50, 52 and 54 Hornbrook Street.
- **Sub 14.1 S D Barclay.** Hornbrook Street and Hayhurst Street are zoned Recreation and currently appear to be waste land which are suitable for future residential use.

- **Sub 19.1** C Wright. Land to the south of Taumatakahu Stream.
- **Sub 23.1** P Brown. Land to the south of Taumatakahu Stream.

These matters are addressed in Attachment E:5. At a **macro** level the rezoning would be consistent with the consolidation of the existing Temuka urban area, as these areas are surrounded by low density suburban residential development. At a **micro level** sites are zoned Recreation 2 due to presenting an unacceptable risk from inundation. The Canterbury Regional Council have advised that these sites are the subject of high levels of inundation and would be contrary to the CRPS approach as to avoiding development in high risk areas.

CRPS **Objective 11.2.1** and **Policies 11.3.1, 11.3.2** seeks to 'avoid' new subdivision, use and development that increases risks associated with Natural Hazards. Approach would also be contrary to Strategic Direction [4] Building resilient communities which seeks to avoid development in high hazard areas where risk from natural hazards is assessed as unacceptable.

The rezoning's are recommended as being **rejected**.

12.3.3.3 Temuka Deferred Area

Sub 65.1 Riverside seeks the deferment of 9 Grant Street for residential use be removed. The site is currently zoned Deferred Residential 1. It is understood that the reasons for that deferment in terms of the provision of efficient and effective infrastructure are yet to be resolved, and that the appropriate zoning remains Deferred Residential 1, furthermore the relief is disjointed from the remainder of the area and would not represent co-ordinated development.

It is noted that the explanation for this zone (Residential 1 Zone (Temuka North West) states:

These stages are intended to be developed sequentially, as the sewer will first service Stage 1 and 1A and then progress northwards to Stage 2. This is to enable Council to budget for the funds it may choose to contribute to the development of services, such as the extension of the sewer

These matters are not overcome, and accordingly, the submission is recommended to be **rejected**.

12.3.3.4 Intensification in and around Town Centres

Sub 16.2 O'Keefe submits that intensification around town centres should not occur, as TDC should favour growth in the suburbs. The statutory framework outlined above focuses on consolidated and coordinated development, with a need to promote modal choice. Accordingly, intensification in and around town centres better achieves that approach than the relief. The relief is recommended to be **rejected**.

12.3.3.5 Rezoning Requests

In Geraldine, 73 Connolly Street (L Burdon, Sub 2.1) and 49 and 63 Connolly Street (McFarlane Family Trust) have requested to be rezoned to Residential 1.

This relief is addressed in Attachment E:5. For **Sub 2** the proposed rezoning conflicts with CRPS **Objective 11.2.1** that seek to 'avoid' new subdivision, use and development that increases risks associated with Natural Hazards. The relief would also be contrary to Strategic Direction [4] Building resilient communities which seeks to avoid development in high hazard areas where risk from natural hazards is assessed as unacceptable.

Only rezoning **Sub 49** in isolation would be consistent with **Objective 5.2.1** in terms of consolidation.

In conclusion it is considered that rezoning either **Sub 2**, or **Sub 2** and **Sub 49** in conjunction would be inconsistent to **CRPS Objective 11.2.1**; with a total yield of 120 households, given the 2048 shortfall of 77 dwellings. The rezoning would be less appropriate with consolidation approach sought in **CRPS Objective 5.2.1** and **Policy 5.3.1**.

However, Submission 49 on its own appears to not be affected by inundation, and given its modest size would not be inconsistent with **CRPS Objective 5.2.1**.

Accordingly, **Sub 2** is recommended to be **rejected**. **Sub 49** is finely balanced, and its merits are noted but is recommended be **rejected** on the basis of provision of Orari Station Road.

In **Timaru**, **Sub 18.1 (Rolling Ridge Trust)** seeks a rezoning of the 50m strip along Pages Road at Lot 3 DP 397906 and 279 & 295 Pages Road, Timaru to Residential 6. The site is identified in the DGMS as Rural Residential. This relief is considered in Attachment E:5.

The relief is recommended to be **rejected**. At macro level the site does not lend itself to residential extension as there is no clear topographical or geographic boundary to delineate the end point of the zone. The site has predominantly a rural residential (and rural further north) character and is considered appropriate for Rural Residential development in the Growth Options assessment (Kellands Hill, g28, 34). Whilst the Infrastructure assessment (**Attachment F**) identifies that the site can be serviced, it is considered that the site would not promote a co-ordinated pattern of development as required by **CRPS Policy 5.3.1**.

In Pleasant Point, **Sub 39.1 (P&L Bartrum)** seek a rezoning to Residential. The matter is considered in Attachment E:5 which recommends **rejection** on the basis that growth projections for Pleasant Point can be met through existing capacity. This option would also be expensive to service. Options for servicing for sewer and stormwater effectively render development, based on a slow uptake of allotments excessive. A rezoning, would provide a defensible urban boundary to the south at German Creek, but not to the east.

13.0 Conclusions

This report provides recommendations based on the 75 submissions received on the notified Draft Growth Management Strategy for Timaru.

Overall, there is very strong support for the planned, strategic approach to growth and the Council's Managed Growth approach to dealing with the environmental, social, economic and governance issues that will confront the district to 2048.

Submissions that have questioned the projected growth for the District have typically been associated with requests for additional land rezonings. As has been identified in the Growth Options and Growth Assumptions Reports accompanying the DGMS, the Timaru District Council has undertaken a commendable stewardship role in pro-actively providing for residential, commercial and industrial land supply to meet forecast demand. That stewardship has meant that there is little need to be reactive in terms of the modest growth projections forecast for the District.

Attachment A – Property Economics Growth Update Economic Overview. November 2017

PROPERTY **E**CONOMICS



TIMARU DISTRICT
GROWTH UPDATE –
ECONOMIC OVERVIEW

Project No: 51700
Date: November 2017
Client: Timaru District Council

SCHEDULE

Code	Date	Information / Comments	Project Leader
51700.5	November 2017	Report	Tim Heath / Phil Osborne

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1. INTRODUCTION

Property Economics has been engaged by Timaru District Council (TDC) to undertake a high-level economic overview of the recently updated (2017) population growth projected for the Timaru market to determine the longer-term retail capacity and industrial land requirement of the District and to inform Council's Timaru Growth Management Strategy (TGMS) and District Plan review processes.

This economic overview also includes updated data on the District's vacant industrial land supply derived from TDC GIS databases, and should be read in conjunction with the previous 2015 (retail) and 2016 (industrial) reports Property Economics completed for TDC which are more detailed than this update. As such this overview report is complementary to these two earlier assessments.

There are three main elements to this update that drive the differences with the previous reports and cumulatively identify a different growth profile for the District. First, are the updated Statistics New Zealand (SNZ) population projections, which have flow on implications for updating household projections. Property Economics have utilised the SNZ Medium Series projections as this is the base requirement in the National Policy Statement on Urban Development Capacity (NPS UDC). SNZ projections are generated from significant data inputs and dynamic variables monitored by SNZ. SNZ projections are also viewed as independent and credible, and form part of their statutory obligations. They also represent the base projection

series utilised in the Environment Court with any deviation from SNZ projections having to be very well justified.

Second, is the significantly extended projection timeframe utilised in this overview (2018-2048) from the earlier retail and industrial reports. This has been fuelled by the introduction of the NPS UDC which came into effect subsequent to the original Property Economics' reports being completed. Therefore, this updated paper now utilises a projection horizon that satisfies the NPS UDC expectation for long term planning of 30 years.

Third, is the NPS UDC obligation to incorporate a buffer or capacity margin to growth in demand to ensure the market can operate efficiently and with limited opportunity for artificial market influences to evolve, i.e. industrial land supply shortfall which may drive land prices higher driving an imbalance in the demand / supply market conditions. The NPS UDC seeks to minimise the potential for this scenario to occur in the future relative to the size of the territorial authority's market.

1.1. KEY RESEARCH OBJECTIVES

The core objectives of this overview are to:

- Quantify, discuss and incorporate the new growth projections into the existing economics models (retail and industrial).
- Analyse any implications of the new growth projections on the outcome of the previous Property Economics reports' and the TGMS.
- Identify and discuss economics risk resulting from substantial oversupply of land zones (commercial, industrial, residential or rural residential) in order to provide important grounding for the strategic approach for Council.

1.2. INFORMATION SOURCES

Information and data has been obtained from a variety of sources and publications available to Property Economics, including:

- Timaru Industrial Land Supply – TDC
- Business Demographic Data – Statistics NZ
- Census of Population and Dwellings 2013 – Statistics NZ
- Household and Population Projections – Statistics NZ
- Retail Trade Survey - Statistics NZ

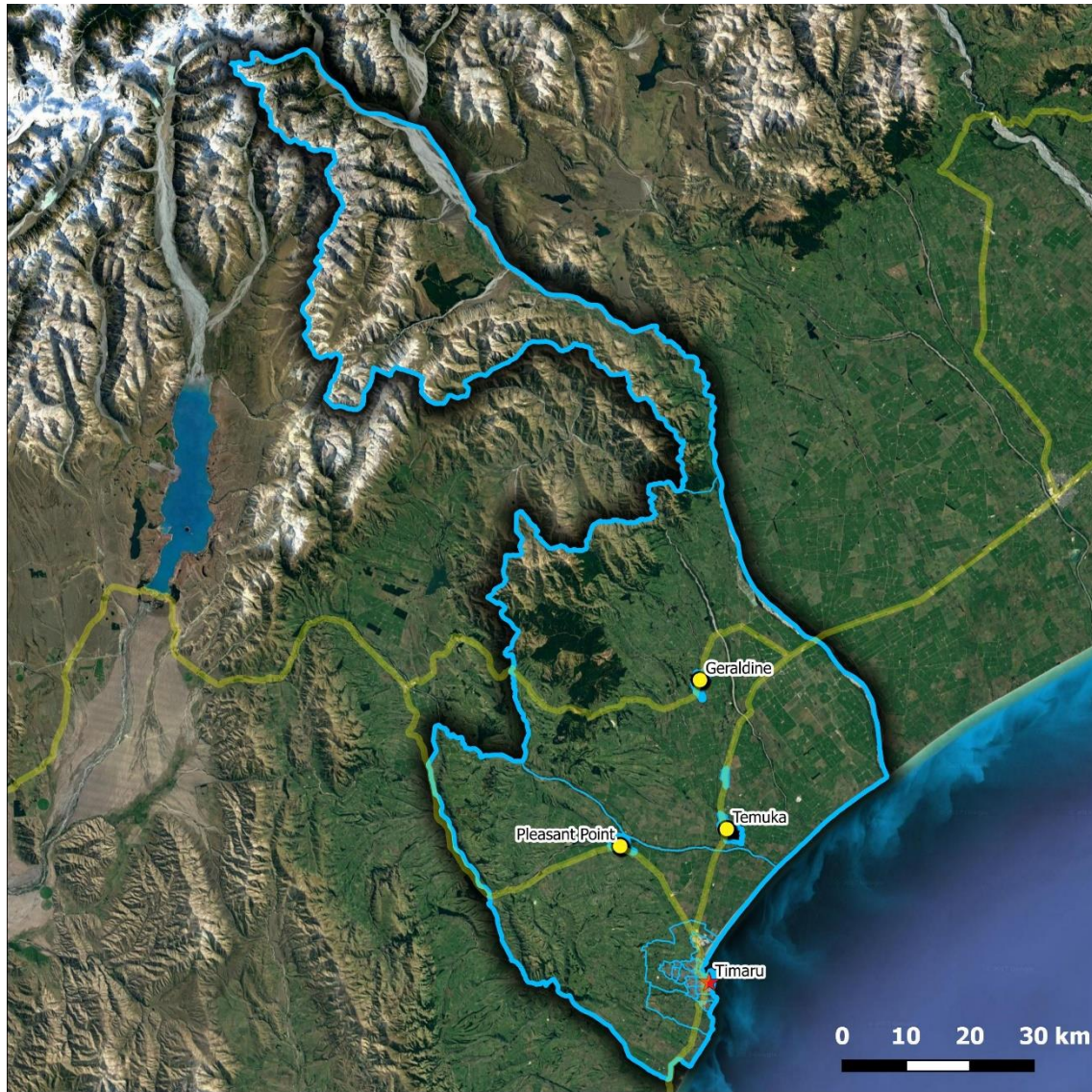
2. TIMARU CORE RETAIL ECONOMIC MARKET

Figure 1 illustrates the geographic boundary for the Timaru territorial authority and the main commercial centres and townships within the district. This is the geospatial extent of the area the Timaru District Plan has jurisdictional authority and the TGMS influences. For the purpose of overview, it is this catchment upon which this assessment is based.

A primary retail catchment is essentially the geographic area from which a retail provision is likely to derive the majority of its sales, the area that the provision is designed to primarily service, and where the provision is considered to have a strategic locational advantage in terms of proximity and accessibility over other centres for retail activity.

It is important to note that this is a porous catchment border, and residents within the Timaru District will also shop in centres outside of the catchment, i.e. Christchurch for higher order comparison goods such as clothing and furniture. Equally, retail activity within the catchment can attract spend from shoppers / visitors who reside outside the demarcated catchment area. However, the catchment illustrated in Figure 1 represents the area where the Timaru market is considered likely to derive the vast majority of its most frequent customers and sales.

FIGURE 1: TIMARU TERRITORIAL AUTHORITY



Source: Property Economics, Google Earth

3. UPDATED POPULATION & HOUSEHOLD PROJECTIONS

Table 1 displays the previous (2015 report) and updated (2017) population and household growth projections within the Timaru District. Both the 2015 and 2017 SNZ projections are derived from Statistics NZ's medium growth series and are derived from the 2013 NZ Census base.

It is important to note that the previous 2015 population per household ratio has been applied to the updated 2017 population projections in order to assess the estimated 2017 household base. The reason for the utilisation of the previous population to household ratio to determine the current District household base is that population and household projections are not updated or released at the same time, and as such the updated SNZ household projections are yet to be updated (from the 2015 report estimate).

This is required to improve the projection accuracy for the District's population and household estimate for the 2018 base year. This overview applies a 2018 base year to reflect we are near the end of 2017, applying 2018 as the base year assists with the NPD UDC analysis, and 2018 estimate grounds the analysis to a Census year.

The differential, and net change, between the 2015 and this 2018 base year updated projections are identified in Table 1. Note Property Economics has extended the projection period to 2048 (using 2018 as the base year) to meet NPS UDC long term planning requirements. This is a longer projection timeframe than the previous retail and industrial reports. The 2013 base year in the previous reports is no longer valid when determining future net additional growth as much of the 2013-2018 may have already occurred, and therefore avoids any double counting in the growth profiling.

TABLE 1: TIMARU DISTRICT POPULATION PROJECTIONS COMPARISON

Population Projections	Base year	3 year (NPS short term)	10 year (NPS medium term)	30 year (NPS long term)	Net Growth # (2018 - 2048)	Net Growth % (2018 - 2048)
2015 Report - Timaru District Population	47,000	47,500	48,400	48,400	1,400	3%
Feb' 2017 Updated - Timaru District Population	47,400	48,100	49,400	50,200	2,800	6%
Difference	400	600	1,000	1,800	1,400	

Household Projections	Base year	3 year (NPS short term)	10 year (NPS medium term)	30 year (NPS long term)	Net Growth # (2018 - 2048)	Net Growth % (2018 - 2048)
2015 Report - Timaru District Population	20,200	20,600	21,200	21,400	1,200	6%
Feb' 2017 Updated - Timaru District Population	20,400	20,800	21,600	22,200	1,800	9%
Difference	200	200	400	800	600	

Source: Property Economics, Statistics NZ

The overall change in the population figures for Timaru is positive and shows an estimated increase in the growth for Timaru. More specifically, Timaru can expect an additional 3% growth (1,400 more residents and 600 more households), over the 2018-2048 period, applying the updated projection figures, compared to the previous projections. This means by 2048, under the new growth projections, the District is estimated to have a net 2,800 more residents above the 2018 base year.

The main change in the longer-term projections is the result of the District's population base no longer estimated to decline post 2033, but rather increase to 50,000 people by 2033, and remain just above that figure for the 2033-2048 period. This has the effect of increasing dwelling demand as some of the existing housing stock that was projected to become vacant over the long term, is now likely to remain occupied, meaning a slightly larger demand for new housing stock long term.

Previous household projections estimated 1,200 new household in the District. This increases to 1,800 new households by 2048, representing a net increase of 600 new households.

Table 2 following breaks down the updated population and household projections (2018-2048 period) by settlement area and includes the original GMS projections (2013-2043) for comparative purposes.

The boxes shaded light orange represent the updated projections and timeframes that sync with the NPS USC forecast periods of current or base year (2018), the 3-year short term period (2021), the 10-year medium term period (2028), and the long term 30-year period (2048).

This enables TDC to understand the implications of the updated growth projections at the more fine grain settlement area level, and subsequent GMS implications for the residential demand and capacity requirements of each settlement area.

TABLE 2: SETTLEMENT AREA PROJECTIONS

Settlement Areas

Timaru Urban Area

Population	Baseyear (2013)	Baseyear (2018)	Short Term (2018)	Short Term (2021)	Medium (2028)	Long Term (2043)	Long Term (2048)
DGMS	26,770		27,240		27,380	26,570	
PE (GMS)	26,770	27,650		27,860	28,230		27,550

Households	Baseyear (2013)	Baseyear (2018)	Short Term (2018)	Short Term (2021)	Medium (2028)	Long Term (2043)	Long Term (2048)
DGMS	11,380		11,707		11,993	11,760	
PE (GMS)	11,380	11,880		12,100	12,370		12,200

Pleasant Point

Population	Baseyear (2013)	Baseyear (2018)	Short Term (2018)	Short Term (2021)	Medium (2028)	Long Term (2043)	Long Term (2048)
DGMS	1,320		1,400		1,560	1,800	
PE (GMS)	1,320	1,400		1,420	1,490		1,610

Households	Baseyear (2013)	Baseyear (2018)	Short Term (2018)	Short Term (2021)	Medium (2028)	Long Term (2043)	Long Term (2048)
DGMS	561		602		683	797	
PE (GMS)	560	600		620	650		710

Geraldine

Population	Baseyear (2013)	Baseyear (2018)	Short Term (2018)	Short Term (2021)	Medium (2028)	Long Term (2043)	Long Term (2048)
DGMS	2,370		2,470		2,560	2,600	
PE (GMS)	2,370	2,500		2,540	2,630		2,710

Households	Baseyear (2013)	Baseyear (2018)	Short Term (2018)	Short Term (2021)	Medium (2028)	Long Term (2043)	Long Term (2048)
DGMS	1,008		1,062		1,121	1,151	
PE (GMS)	1,010	1,070		1,100	1,150		1,210

Temuka

Population	Baseyear (2013)	Baseyear (2018)	Short Term (2018)	Short Term (2021)	Medium (2028)	Long Term (2043)	Long Term (2048)
DGMS	4,180		4,260		4,360	4,350	
PE (GMS)	4,180	4,330		4,370	4,450		4,360

Households	Baseyear (2013)	Baseyear (2018)	Short Term (2018)	Short Term (2021)	Medium (2028)	Long Term (2043)	Long Term (2048)
DGMS	1,777	1,831			1,910	1,925	
PE (GMS)	1,780	1,860		1,900	1,950		1,930

Source: Property Economics, Statistics NZ

4. RETAIL EXPENDITURE AND SUSTAINABLE GFA

This section of the overview updates the estimates on the level of retail sector expenditure that is generated by the District on an annualised basis in 2017 NZ dollars using the 2006 ANZSIC categorisation system as per the previous (2015) report provided to TDC.

Table 3 compares the original 2015 retail expenditure and sustainable retail demand forecast figures with the updated forecast figures using 2018 as the base year, and extended projection timeframe. Note the 2015 retail model figure has been extended to 2048 to enable a comparative context to be provided.

TABLE 3: ANNUAL RETAIL EXPENDITURE COMPARISONS

Retail Expenditure (\$m)	Base year	3 year (NPS short term)	10 year (NPS medium term)	30 year (NPS long term)	Net Growth # (2018 - 2048)	Net Growth % (2018 - 2048)
2015 Model	\$467	\$486	\$531	\$675	\$208	45%
Feb' 2017 Updated Model	\$471	\$492	\$542	\$700	\$229	49%
Difference	\$4	\$6	\$11	\$25	\$21	-

Sustainable GFA (sqm)	Base year	3 year (NPS short term)	10 year (NPS medium term)	30 year (NPS long term)	Net Growth # (2018 - 2048)	Net Growth % (2018 - 2048)
2015 Model	85,300	88,700	96,900	123,000	37,700	44%
Feb' 2017 Updated Model	86,100	89,800	98,900	127,400	41,300	48%
Difference	800	1,100	2,000	4,400	3,600	-

Source: Property Economics

The updated growth projections flows through to an increase in the forecast generated retail expenditure and sustainable GFA for the Timaru District. The overall net increase in annual retail expenditure by 2048 as a result of the higher forecast population growth is \$21m compared to the 2015 projection (\$229m vs \$208m).

Similarly, the net growth in sustainable GFA derived from the generated retail expenditure by 2048 has subsequently increased from around 37,700sqm to around 41,300sqm with the updated population projections. The means under the updated growth projections, the Timaru market can sustain 3,600sqm GFA more than previously estimated. Overall, the current updated projections results in a net additional 4% in retail expenditure and sustainable GFA by 2048.

Table 4 illustrates differences in the updated sustainable retail GFA against previously assessed District centre retail supply, providing an overview of the supply vs. demand dynamics of the Timaru market. It is important to note that retail supply does not typically match sustainable retail GFA given the constant movement in the market. This analysis gives an overview of the market demand / supply differential at a point in time and therefore figures in Table 4 should not be regarded as strict guidelines but more a general steer towards what is appropriate to provide. The key component of the table is the 'Differential' which in effect provides a 'net position' on the demand / supply analysis.

TABLE 4: EXISTING SUPPLY VS UPDATED FORECAST SUSTAINABLE RETAIL DEMAND (SQM GFA)

Total	Base year	3 year (NPS short term)	10 year (NPS long term)	30 year (NPS long term)
Sustainable Demand	86,100	89,800	98,900	127,400
Existing Provision	100,000	100,000	100,000	100,000
Differential	13,900	10,200	1,100 -	27,400

Source: Property Economics

The core difference between the previous 2015 and current update is the subsequent increase in sustainable demand levels due to an increase in the population base and extended NPS UDC time period being assessed.

For the total Timaru market, there is currently an estimated surplus of retail GFA (when assessed against sustainable supply) of around 13,900sqm (2018 year), and this surplus is not expected to meet the sustainable demand until just after 2028. For the 30-year planning horizon, by 2048 there is estimated to be a retail GAF shortfall (compared to the existing provision) of 27,400sqm GFA.

Table 5 translates the sustainable retail demand into sustainable land area to assist TDC in their commercial land capacity analysis. The additional retail land estimates in Table 5 assume all land is efficiently developed. To assist in this analysis, Property Economics has applied an average 45% retail GFA to land ratio, and included a 20% NPS UDC buffer for short term and medium-term timeframes, and 15% buffer for the longer term 30-year period. This aligns with NPS UDC requirements.

TABLE 5: TIMARU ADDITIONAL RETAIL LAND REQUIREMENTS

	Base year	3 year (NPS short term)	10 year (NPS medium term)	30 year (NPS long term)
Sustainable Retail Land Requirement (ha)	19.1	20.1	22.5	29.7
Additional Retail Land Requirement (ha)		-	-	7.0

Source: Property Economics

The base year estimates 19.1ha of efficiently developed retail land is sustainable by the Timaru market. This increases incrementally by 1ha after 3 years, 3.5ha after 10 years, and 10.5ha after 30 years based on market growth, to a total sustainable District retail land requirement of nearly 30ha by 2048.

However, Table 4 identifies a current surplus of retail GFA with the District which means short term market growth is more efficiently channelled into supporting the existing retail GFA to improve quality of the retail provision and shopping environment. It is not until post the 10-year Medium term period that additional commercial land for retail activities will be consumed. By 2048, based on the market growth, an additional 7ha is estimated to be required. This retail land requirement needs to be offset against the current vacant commercial land provision in the District (with Timaru the highest requirement urban centre) and considered in the TGMS to ensure Council can satisfy the NPS UDC long term obligations.

Outside the scope of this update, but also crucial for TDC to factor into the business / commercial zoned land provision of the District moving forward is the demand for commercial service activities and commercial office space, which compete for commercial land. These are important activities that comprise a material proportion of a centre's composition.

5. INDUSTRIAL EMPLOYMENT AND LAND FORECASTS

Property Economics have projected industrial employment for Timaru District out 2048, factoring in changing labour force participation rates over the period.

It is also important to note that these projections do not factor in changes in industrial land prices resulting from changes in price in surrounding areas. These factors can influence where businesses decide to locate, however given the unpredictability of land values, for the purpose of this overview it has been assumed that relative prices between the Timaru and surrounding areas remain constant over the forecast period.

Table 6 below illustrates the forecast industrial employment growth and potential level of additional industrial land demand for Timaru. Note Employment Count (EC) is the Statistics NZ measure for employment in a geographic area.

TABLE 6: TIMARU PROJECTED INDUSTRIAL LAND DEMAND

Industrial Activity Growth 2018 - 2048	Base year 2018	3 year (NPS short term)	10 year (NPS medium term)	30 year (NPS long term)	Growth 2018-2048
Industrial Employment (ECs)	9,006	9,235	9,534	10,198	1,192
Additional Industrial Land Requirement (ha)		18.8	40.8	91.5	

Source: Property Economics

The additional industrial land requirements identified in Table 6 (bottom row) factor in the potential need for infrastructure as well as the NPS UDC margins outlined in PC1.

The updated industrial employment projections for the District (modelled over an extended timeframe to 2048) estimate an additional 1,200 (rounded) industrial employees in the District by 2048.

Table 7 provides a consolidated table of the latest light and heavy industrial land figures for the Timaru District as supplied by TDC. A more detailed breakdown by area is provided in Appendix 1.

TABLE 7: TIMARU DISTRICT INDUSTRIAL LAND SUPPLY (HA)

Industrial Zone Type Heavy / Light	Area of Industrial Zone (Ha)	Area of Zoned, Useable, Vacant & Presently Available Industrial Zoned Land (Ha)	Area of Zoned, Useable, Vacant & Available Industrial Zoned Land (Ha)
Light (ha)	241.4	39.4	53.5
Heavy (ha)	477.5	112.3	149.2
Total (ha)	718.9	151.7	202.7

Source: Property Economics, TDC

Note the difference between the 151.7ha and 202.7ha is the usable and vacant deferred industrial land provision in Washdyke, which for the purposes of this analysis is not considered presently available or serviced, but could be over the life of the Growth Management Strategy.

Overall, the District has a total industrial zoned land supply of around 719ha, of which 203ha is vacant. Not all this vacant industrial zoned land is serviced, but given the 2048 estimated land requirement of 91.5ha, the district is well served when assessing future industrial land demand against existing zoned vacant industrial land capacity. This updated analysis shows the District has more than sufficient zoned vacant industrial land supply to meet the District's future industrial requirements for the first half of the century.

This also assumes all growth equates to new industrial development on vacant land. In reality, a portion of the existing industrial land resource, i.e. utilisation of existing vacant industrial premises, and redevelopment of inefficiently utilised industrial sites, would accommodate some of the forecast demand. This would have the effect of minimising the servicing requirement of Council for new greenfield industrial land. Quantifying the level of inefficiently utilised industrial land in the District, and therefore industrial redevelopment potential, is outside the scope of this update, but any such provision would add further capacity to the District's ability to accommodate future industrial growth.

6. ECONOMIC IMPACTS OF OVERSUPPLY

These economic impacts have the potential to take the form of land, infrastructure and production inefficiencies as well as adversely impacting upon the land market itself. Potential economic impacts include:

Inappropriate Land Prices

A key concern of the oversupply of land (particularly industrial and residential land) is a significant fall in land prices. While improving competition at a wider level this impact has the potential to result in:

- *Reduction in the level of productive land:* Appropriate land values operate as an incentive for the efficient utilisation of the land resource. Economies that exhibit particular low relative land values often suffer from inefficient land use as holding costs are low. This reduces land productivities and in turn impacts upon the economy's cost of business. This can result in land banking as land owners are unwilling to offer more productive (and suitable) land areas at lower prices.
- *Reduced redevelopment:* There has been a significant shift in the composition of industrial activity within the Timaru District over the last 16 years. This change results in the fall in demand for specific premises (e.g. Factory space). The potential oversupply of industrial land and subsequent low prices essentially render redevelopment of existing industrial sites for other industrial activities unviable as these activities are more easily and affordably developed on vacant land.
- *Investment uncertainty:* The oversupply of industrial and residential land and associated disincentive to redevelop significantly reduces the market's willingness to invest in long term capital developments. This is due to the fact that significant capital investments do not represent sound long term investments as productivity levels fall so too do rents and the potential to maintain quality premises.
- *Attraction of transitory business:* While lowly priced industrial land has the ability to attract certain businesses, these businesses are historically dominated by transitory businesses that prioritise price in the short term. The resulting lack of investment and balance in the economy has resulted in a significant reduction in the long-term competitiveness of economies.
- *Under-capitalisation:* low land prices and the businesses attracted by them often lead to low quality built form which not only reduces flexibility for changing activities but also impacts upon the overall industry amenity levels.

Lack of Critical Mass

Although the TGMS seeks to avoid the unnecessary dispersal of activity, it still has the potential to disperse the potential demand for land over a significantly larger area than would otherwise be required, potentially reducing the benefits of these activities locating close to other existing activities. To maximise the benefits, through minimal dispersal of activity, relies heavily on effective governance, leadership and implementation being administered appropriately in the market. Other principles such as more sustainable infrastructure, resources, and diverse / thriving centres are also important in relation to delivering a better economic future for the Timaru District.

The absence of this critical mass can lead to adverse economic effects such as:

- *Low amenity:* The provision of appropriate amenities (such as quality built form, associated business facilities, and open space) and the efficient provision of support services requires businesses to be located close to one another so that a number of them can draw from those services and amenities. Continued expansion would develop activities with decreased densities (i.e. with businesses further spread out) which reduces the efficient provision of the amenities and services in the area.
- *Failure to capture agglomeration benefits:* The concept behind agglomeration benefits is directly related to effective densities, these densities impact upon the level and realisation of agglomeration benefits. Spreading potential growth over an area significantly greater than that required is likely to have a proportionate impact on these benefits.

APPENDIX 1: TIMARU DISTRICT VACANT LAND PROVISION BY AREA

Location of Industrial Area	Industrial Zone Type H or L	Area of zone (ha)	Area of zoned, usable, vacant and available industrial land (ha)
Timaru CBD	L	13.13	0.16
Port	L	8.81	0
	H	65.09	0
Washdyke	L	68.56	9.89
	H	181.71	31.5
Washdyke Deferred	L	37.89	14.1
	H	39.28	36.9
Redruth	L	16.67	1.7
	H	69.47	0.6
Showgrounds	L	10.08	2.3
Smithfield	H	24.94	2.9
Fairview Road	L	5.26	1.6
Timaru Total	L	160.4	29.75
	H	380.49	71.9
Clandeboye	H	65.1	65.1
Geraldine	L	10.69	1.38
Barkers	L	12.95	9.5
Temuka	L	48.27	8.8
Pleasant Point	L	3.89	2
Winchester	L	5.18	2.1
Pareora	H	31.9	12.2

Attachment B – Individual Submission Points and Recommendations

sSub No.	Name	Address	Email Address	Topic of the Draft GMS submission that relates	Sub Topic	Sub-Submission	Degree of Agreement	Reasons/Further Comments	Staff Comments / Recommendation
1	S Wolczuk	108 Waitohi Temuka Road, Temuka	suewolczuk@hotmail.co.nz	Town Growth	TeGA, NR	S1.1	A	Would like Council to consider 50, 52 and 54 Hornbrook Street for residential use.	Sub 1.1. Reject. Refer Section 12.3.2 and Attachment E:5.
					RRGA, NR	S1.2	SA	Would like Council to consider Waitohi Road for future housing.	Sub 1.2 Reject. Waitohi Road some distance from Urban Boundary, Refer Section 4.3 and Attachment E:1.
				Strategic Directions	Overall, D1, D2, D3, D4, D5, D6, D7, D8, D12	S1.1 / S1.2	NN	Would like individual cases be looked at.	Sub 1.1 / 1.2. Considered within the assessment.
					D9, D10, D11	S1.3	A	The growth in Temuka needs to utilise empty land available as well as expand outside the settlement boundaries.	Sub 1.3. Agreed, however capacity of supply exceed projected long-term demand even absent of utilising empty (or zoned recreational) land.
2	L Burdon	73 Connolly Street, Geraldine	wittonlodge@clear.net.nz	Town Growth	GGA, NR	2.1	SD	Future residential growth to the south of Geraldine Township is against the northward market growth, is on high flood risk land that has poor drainage, and is adding pressure on existing sewer system which is at capacity. Future residential growth should be focused on infill development, which is supported by Councils report provided in the past years. Would like to discuss with Council about own land at 73 Connolly Street, Geraldine.	Sub 2.1. Reject. Refer Section 12.3.3.5.
						2.2		Disagree with new industrial site on Tiplady Road.	Sub 2.2. Reject. Given there is only 1.19ha of zoned and available Industrial land in Geraldine to meet localised demand, this option has been considered by Timaru District Council to be the most appropriate. Refer 6.3.2.
					RRGA	2.3	A	Do not like the existing dispersal of lifestyle blocks in Geraldine.	2.3 Accept. Need to manage Rural Residential supply to not undermine consolidation approach. Refer Section 2.1.4 Rural Residential – the approach.
					Overall			Deferred land has merit. Defines future development without restricting current uses of the land. Strategy might go some way to addressing long term development.	
3	CBD Investment and Strategy Group	62 Wai-iti Rd, Maori Hill, Timaru	aboorth@starwood.co.nz	Town Growth	TuGA	-	A	No Comment.	
				Strategic Directions	Overall	3.1	A	The predicted growth is very conservative.	3.1 Reject. The approach applied utilises the most update Medium Growth Statistics NZ Projections. Refer 1.3.5.
					D1, D2, D3, D4, D5, D6, D9, D10	3.1	NN		
					D7	3.2	SD	Enjoyment of amenities and natural assets has to be the highest priority for the transport direction.	Sub 3.2. Reject, Refer Section 8.3.1.
					D8	3.3		Considers there is a lack of infrastructure.	Sub 3.3 Reject. Refer Section 9.
					D12, AC	-		No comment.	
					D11	-	D	No Comment.	
4	H Larsen	49 Hally Terrace, Temuka	larsen1500@xtra.co.nz	Town Growth	TuGA, GGA, PPGA, RRGa	4.1	SA	Concerned there is no provision for additional commercial and industrial uses in Timaru. Commercial opportunities are the key of growth in employment market, the lack of commercial / industrial land may result in loss of business development opportunities and investors.	Sub 4.1 Accept in Part. Refer Section 5.

					TeGA, NR	4.2	D	<p>There is the need to provide a variety of land sizes, including rural residential sized land. High density developments are for the larger cities while people settle down in small townships for larger blocks of properties.</p> <p>Land adjacent to the Tamitahu Stream, including 50, 52 & 54 Hornbook Street, Temuka is zoned in recreation with limited use. Such land is available and is suitable for future residential development.</p>	Sub 4.2 Reject. Refer 12.3.2.
				Strategic Directions	Overall, D3, D4, D5, D7, D10, D11, AC	-	A	No Comment.	
					D2	4.3	NN	Would like to see more art works in public places.	Sub 4.3 Reject. Too specific for GMS. Refer Section 1.3.4.
					D6	4.4		The District is dominated by big players. More work need to be done to attract smaller investors to bring variety of business to our District. The District is too tough for small business to survive.	Sub 4.4 Reject. Refer Section 5.5
					D8	4.5		Roading status in Temuka are not good with road damage on main road and intersections. Better roading formation is needed to avoid damage.	4.3 Reject. Too specific for GMS. Refer Section 1.3.4, and Section 8.0. Relates to maintenance LoS for roading infrastructure
					D9	-		No Comment.	
					D12	4.6		There needs to be a greater level of transparency with Council and clients. In particular how much a consent costs and why it was granted should be made public information for a fair play.	Sub 4.6. Reject. Refer 11.3.4. Relates to transparency in terms of Building and RC fees and charges.
				Economic Growth	N/A		N/A	Would like to see a Regional Economic Development Forum developed to look at how the region will create an environment that attracts investments. Lessons can be learnt from other successful regions.	
5	Timaru District Holdings Limited	2 King George Place, Timaru	tina.rogers@timdc.govt.nz	Town Growth	TuGA, NR	5.1		Does not envisage the Showground site be used exclusively for large scale retail. It envisages light industrial use would be suitable given the location, accessibility and servicing capability. The site is ideal for industrial and commercial activities. There is significant demand for industrial land at the port and supply is limited. The Showgrounds site could be used to meet some of this demand.	Sub 5.1. Accept in Part. Refer Section 6.3.2 and Attachment E:3.
				Strategic Directions	Overall, D6	5.2	A	Supports the Sustainable Economy Directives outlined on page 54 of the Strategy.	Sub 5.2 Accept. Section 6.
6	M Thompson	PO Box 2081, Washdyke	michelle@thompsonltd.co.nz	Town Growth	TuGA	6.1	NN	Agree in principle with the demand for residential expansion and the consolidation approach in Town centre.	Sub 6.1 Accept Section 3.6.
						6.2		Disagree with approach to Industrial Land. The expected even out of population by 2031 does not equal to the trend of industrial demand. Industrial growth is expected and industrial land should be prepared and readily serviced to accommodate the market demand to attract businesses to the District.	Sub 6.2 Reject. Refer Section 5.5. For the Timaru District, as outlined by Property Economics (Attachment A) there is more than sufficient zoned Industrial land, at the macro district level to meet the 10 year (medium term) and 30 year (long term) demand. At a District level, the Industrial market is not constrained.
					GGA, NR	6.3	SA	Strongly agree with approach in Residential growth.	Sub 6.3. Acknowledged.
						6.4		<p>Agree with a light industrial area identified away from residential area. Services in the new industrial area need to be carefully considered.</p> <p>Consider Vance Road is suitable for Transport type business given the location, soil type, and existing land use.</p> <p>The area of land North West Geraldine currently zoned Rural2 between the Waihi River and the State Highway 72 up to Bennett Road / Woodbury Road intersection is on busy tourist route and the area is suitable for tourism related activities.</p>	<p>Sub 6.4 Reject. Refer Section 5.4. Note</p> <p>Specific tourism operation more suited to consent process than spot zone.</p> <p>North West Geraldine Area prone to flooding.</p> <p>Tiplady preferred Industrial approach for limited Industrial demand to Vance Road.</p>

					PPGA, TeGA	-	NN	No Comment.	
					RRGA	-	A		
				Strategic Directions	Overall, D9, D10, D11, D12	-	A	No Comment.	
						-			
						-			
					D3	6.5	SA	Retirement village typed land use need to be provided to accommodate the aging population.	Sub 6.5. Accept. GMS promotes this type of housing choice.
					D6	6.6		Economy is essential for our District. Need to use our available resources wisely, such as water use.	
					D7, D8	6.7		Would be great to provide an alternative route through smaller towns for large trucks to avoid disturbance and vibrant the locals, businesses and tourists alike. Perhaps a bypass via Orari Back Road.	Sub 6.7. Reject, Refer Section 8.3.2.
					D4	6.8	A	A blend of services and recreation is prudent.	Sub 6.8. Accept.
					D5	6.9		Consultation with Runanga needs to take place as part of the process but should not add another layer of cost and compliance for landowners / business owners.	Sub 6.9. Accept in part. Refer Section 11.3.1.
					AC	-	NN	No Comment.	
7	CA Eggeling	318 Pages Road, Gleniti, Timaru	cliff.jean@xtra.co.nz	Town Growth	RRGA	7.1	A	Do not think rural land north of Pages Road should be developed until all land within the town boundary has been built on.	7.1 Accept in Part. Rural Residential zoning is important to provide for that segment of the Market. Refer Section 4. Rural residential living has a different purpose to more intensive residential in terms of diversity of living environments.
					TuGA	7.2	N/A	Would like to see Town Planning to adjust existing town concept plans for roaming layout to better enhance future development especially with the continuation of Dobson Street in Timaru.	Sub 7.2 NA. To specific.
				Strategic Directions	Overall	7.3	A	Agree because Timaru is expanding at a great speed. Own development at Hunter Hills Drive and other recent developments proved this. Commend the Council for what they are trying to achieve.	Sub 7.3. Accept. No comment required
				Transport	Speed Limit	7.4	N/A	Would like to see the 50kph zone decreased on Pages Road, Timaru from 254 Pages Road through to 377-383 Pages Road due to the danger of an pending accident.	Sub 7.4 Reject. Refer Section 1.3.4 Transport Unit of Council to consider but not GMS matter as too specific. Section 7.0.
					Formation	7.5	N/A	Would like the kerb and channel be established on Pages Road, Timaru to the area of 377-383 Pages Road especially on the town side of the road.	Sub 7.5 Reject Refer Section 1.3.4. Infrastructure Unit to consider but not GMS matter as too specific.
8	K Beck	238 Gleniti Road, RD 4, Timaru	blueyes65@xtra.co.nz	Town Growth	RRGA	8.1	NN	<p>Rural Residential must be considered to avoid urban sprawl. It is recommended to limit Rural Residential sizes between 0.4ha to 0.6ha. Properties of this size would have scope to develop an orchard, bee hives, a livestock paddock or market gardening.</p> <p>Provision of native planting, including planting along right of ways should also be considered.</p>	Sub 8.1 Reject. Size is critical determinant of character and amenity. 0.5 to 1ha generally seen as appropriate Industry standard. Having a band of 0.4 to 0.6 would be too constrained, and starting to develop urban (and more manicured outlook). Refer 4.5

9	I Geary	66 Timaru-Temuka Highway, Washdyke, Timaru	igeary@xtra.co.nz	Administration	Corruption	9.1	N/A	There is lack on how any corruption is to be anticipated, assessed, audited or mitigated against in the process. To address this deficiency, Council has to acknowledge the potential of corrupt practices in the process, extensively research the areas and remedy actions to take place to reduce corrupt practices. The Council itself could be tainted and uses contradictory practices that may fall into the definition of corruption.	Sub 9.1. Reject. Refer 11.3.4. LGA sets out a process around transparency of decision making. All records for the preparation of the GMS including background reports have been consulted on. Unsure as to whether this matter is specific to GMS or broader.
10	F Ross	46 Selwyn Street, Maori Hill, Timaru	fraserross@clear.net.nz	Town Growth	TuGA	10.1	A	<p>Generally agree.</p> <p>Within the proposed Rural Residential development at Kelland Heights, there area at least two areas that contain natural values within or nearby. One is the Kellands Hill natural carex wetland in a natural gully west of the road, the other is further up this gully, below the Mt View Village. If these two areas fall within the Rural Residential areas, these natural features should be retained and maintained.</p> <p>Consideration should also be given to maintaining the excellent far reaching views that can be seen from both Kelland Hill Road and Pages Road.</p> <p>Some areas, for example the south end, that contain many older dwellings could be an area for renewal of housing.</p>	Sub 10.1 Accept in Part. Important that these areas are considered in terms of (a) their statutory relevance, and (b) if important they are appropriately identified and incorporated within the subsequent ODP process for this area to be incorporated in the District Plan. In relation to older dwellings it will be up to the market / owners as to the desire for retention, unless of heritage importance TDC cannot require retention.
					GGA	10.2	A	<p>Generally agree.</p> <p>The natural values of native trees on Downs need to be retained and protected from development - if not already done so.</p>	Sub 10.2 Accept The significance of these trees needs to be considered in terms of notation within the District Plan. If not notable, but of high amenity / character value to be considered as a defining characteristic for any outline plan for Rural Residential development. No changes needed in the GMS.
					PPGA	-	A	No Comment.	
					TeGA	10.3	A	The existing walkways and cycling tracks be extended, where possible, and not crowded out by building developments.	Sub 10.3 Accept To be considered in terms of internal setbacks from buildings in the replacement District Plan.
					RRGA	10.4	A	<p>Generally agree the rural residential development should be more targeted to prevent rural sprawl.</p> <p>Not to provide rural subdivisions near or within significant natural areas as of right. Buffer zone or protection as should be placed around such areas to protect them.</p>	<p>10.4 Accept. Refer Section 2.1.4</p> <p>Setbacks to significant natural areas to be considered as part of the ODP process.</p>
				Strategic Directions	Overall, D1, D4, D5, D8, D9, D10, D12	10.5	A	Generally agree with intensions of the directions and agree they are important matters to consider.	Sub 10.5. Accept.
					D2	10.6		Landscapes and natural features and production land need to be retained and protected from developments.	Sub 12.5. Accept Section 10. Agree will be updated through District Plan process
					D3	10.7		Existing settlements and urban form be retained and urge new buildings to blend in with existing patterns. Holiday homes need to be limited to those existing already.	Sub 12.5. Accept in part Section 10. Agree urban design important - will be considered in Commercial, Industrial and Residential District Plan built form standards. Council is unable to limit the extent of holiday homes.

					D6	10.8	SA	Business development and economy is important and should be promoted by Council.	Sub 10.8 Accept - diversity and enablement is important.
					D7	10.9	NN	Should encourage people to use the existing public transport system.	Sub 10.9 Accept. Refer 8.3.2
					D11	10.10	SA	Very important to keep the open spaces to retain the views to outstanding landscapes in the District.	Sub 10.10 Accept. Landscape analysis through DP will be used to identify the main landscape vistas. For new RR areas this will likely be a matter to be considered in the preparation of ODP. For existing urban areas, it will be impossible to retrofit such vistas.
					AC	10.11	A	Climate change and how it will affect coastal area need to be considered.	Sub 10.11. Refer 11.3.3. These matters are prescriptively set out in the CRPS
11	H Frank	69 Fairview Road, RD 2, Timaru	itod03@clear.net.nz	Town Growth	TeGA	11.1	SA	Need to provide appropriate infrastructure to support higher density developments.	11.1 Accept. Refer 9.3.1. No change to text.
					GGA	-	A	No Comment.	
					PPGA, TeGA	-	SA		
					RRGA	11.2	A	Should still enable options outside the identified area where justifiable.	Sub 11.2. Accept in Part. Refer Section 4, however dependent on sustainable growth and statutory framework. Current approach is seen as appropriate. CRPS seeks to discourage dispersed Rural Residential. The District Plan will not prohibit these activities in the rural zone, and will allow for consideration based on merits, likely to turn its face from such opportunities.
				Strategic Directions	Overall		SA	No Comment.	
					D1, D3, D4, D10, D11	11.3	SA	Strongly agree with these directions.	Sub 11.3. Accept.
					D2			Strongly agree with this direction, in particular "(i) recognise and protect outstanding natural landscapes and natural areas in the district from inappropriate activities".	Sub 11.4. Accept.
					D5	11.4	NN	Depends on how this happens.	Sub 11.4. Accept in part Refer Section 2.1.5. Consultation with Iwi, note community building and statutory requirements.
					D6	11.5	A	Support the statement "as efficiently and effectively serviced by supporting infrastructure".	Sub 11.5. Submission noted.
					D7	11.6		More emphasis should be given to use more environmentally friendly transport e.g. rail, boat.	Sub 11.6. Submission noted.
					D8	-		No Comment.	
					D9	11.7	SA	Strongly agree, especially support "maintain or enhance areas or features of cultural, historical, landscape or ecological value"	Sub 11.7. Accept. Section 11. Areas to be identified and consulted on in the District Plan process.
					D12	11.8	A	Might include NGOs.	Sub 11.8. Submission noted. Need to consult with NGO's will be issue specific.
					AC	11.9	A	Where the benefits are clearly related to one group, it should be reflected in the costs for this group. However, some costs cannot be allocated directly and will benefit the wider community.	Sub 11.9. Submission noted.
				Infrastructure	Water Quality	11.10	N/A	More consideration needs to be given to water quality e.g. through storm water and seek ways to minimise impact on water quality.	11.10 Accept. Refer 9.3.1. No change to text. Already being considered as part of the Infrastructure Strategy.
12	T Titheridge		toyridge01@gmail.com	Town Growth	TuGA	12.1	NN	Would endorse a modest increase in housing density. However, to accommodate the projected increase, infrastructure, amenities and business centres need to be looked at as suburbs on the outer suburbs of town grow and develop.	Sub 12.1 Accept. Need to ensure that infrastructure matches growth on the suburbs

					GGA	12.2	D	Do not agree the proposed light industrial zone on Tiplady Road due to conflicts between residential and light industrial use, as well as the traffic hazard at the Coach Road intersection.	Sub 12.2 Reject. Refer Section 6.3.2
					PPGA, TeGA, RRGa	-	NN	No Comment.	
					Overall	12.3	A	The strategy is needed for future growth of Timaru, however, it did not look at the big picture. Do not want to see future development in Washdyke along the sea due to sea level rise.	Sub 12.3. Accept. Refer 11.3.3. Washdyke already zoned, MfE Guidance on sea level rise and inclusion in District Plan may reduce developable area. Submissions seeking expansion at Washdyke in coastal margin have been recommended to be declined.
				Strategic Directions	D1	12.4	NN	Heritage should be retained and restored as much as possible. Earthquake prone alone is not a justifiable reason to demolish a heritage building.	Sub 12.4. Accept in part. Criteria for demolition will be considered in District Plan, however economics of being earthquake prone cannot be ignored.
					D2, D3, D8	12.5		As long as sufficient green spaces are provided for and urban planning will cope to demands.	Sub 12.5. Accept Section 10. Also, the Timaru District Council Parks Strategy (2012 – 2022) manages this matter.
					D4, D5, D9	-	NN	No Comment.	
					D6	12.6	A	Encouragement of cycle lanes, walking buses, green spaces and trees are accounted for.	Sub 12.6. Accept Submission assumed to be based on need for amenity in terms of business growth and diversity. Standards will be required through District Plan provisions.
					D7	12.7	NN	To encourage cargo movements by rail.	Sub 12.7 Facilitated by demand and Kiwirail. There is little the Council can do to increase reliance.
					D10	12.8		Ensuring light industrial and residential are not located close to one another.	Sub 12.8. Accept Apart from Tiplady and Washdyke, no new Industrial zones established. Important to manage nuisance issues at the interface through District Plan provisions
					D11	12.9		Ensuring parks and reserves are looked after and are not developed for residential or commercial uses.	Sub 12.9 No rezonings proposed for parks and reserves, refer submission for rezoning in Temuka.
					D12	12.10	A	Engagement with community is needed.	12.10 Strategic Directions 12 seeks to enhance consultation, community engagement and transparency.
					AC	12.11	A	Ensure Timaru is an age friendly centre, in accordance to World Health Organisation.	Sub 12.11. Accept. Part of the focus of the GMS is recognising and providing for the needs of an increasingly elderly population.
				Administration	Rates	12.12	N/A	Keep rates low in Geraldine.	Sub 12.12. Noted. Remains a focus for the LTP.
13	L Robertson	491 Pages Road, RD4, Timaru	lucindarobertson@yahoo.co.nz	Town Growth	TuGA, RRGa	13.1	SA	Support the rezoning in Kellands Heights, Gleniti North and Elloughton South areas from Rural to Rural Residential as: - The land is already in use as lifestyle blocks. This will avoid dispersion of lifestyle blocks into production land. - The rezone will provide housing options with manageable lifestyle blocks which is currently lacking. - Infrastructure and schools are readily available in this area. Suggestions to overcome potential adverse effects: - Restrictions to protect views of existing residents in the area. - Restrictions for noise emission above normal living noise to avoid reverse sensitivity.	13.1 Accept. Need to manage Rural Residential supply to not undermine consolidation approach. Refer Section 2.1.4 Rural Residential – the approach Support for Kellands approach given existing environment. Issues around views and noise levels will require a combination of zone standards for the RR zone with regard to open space, density and noise levels, and potentially requirements in the ODP for major viewshafts.
14	SD Barclay	56 Horncrook Street	stuart.dickson@vodafone.co.nz	Town Growth	TuGA	-	A	No Comment.	

					TeGA, NR	14.1		Further to the proposed locations, Hornbrook Street and Hayhurst Street are zoned Recreation and currently appear to be waste land which are suitable for future residential use. Flood risk on these properties should have been removed with flood protection works carried out in recent years.	Sub 14.1 Reject. Refer Section 12.3.2 and Attachment E:5.	
					RRGA	14.2	A	Generally agree with the direction but should rezone and utilize existing vacant land first.	14.2 Accept. Need to manage Rural Residential supply to not undermine consolidation approach. Refer Section 2.1.4 Rural Residential – the approach	
					Strategic Directions	Overall, D1, D2, D4, D6, D7, D12, AC	-	A	No Comment.	
						D5, D10	-	NN		
						D3	14.3	D	Should firstly utilise existing vacant land before further encroachment into rural land.	Sub 14.3. Accept.
						D8	14.4	A	The difficulty of providing sewerage can be overcome by the use of step systems or maceration pumps without major mains.	Sub 14.4 Reject. Refer Section 9.
						D9	14.5	D	Disagree with the urban encroachment on prime rural farm land.	Sub 14.5. Reject. Refer 11.3.2.
						D11	14.6	SA	The reserves, parkland and walkways in Temuka are a wonderful asset.	Sub 14.6. Accept.
15	I & A Pierce	279 Pages Road, Gleniti, Timaru		Town Growth	TuGA, RRGa	15.1	NN	The proposed Kellands Heights rural residential area may impact the submitter's property as it adjoins three out of their four property boundaries. However, the submitter does not anticipate any serious impact and is therefore adopting a neutral position in regard to the rezone.	Sub 15.1 Note neutral position. Need to ensure that interface with existing areas is respected in terms of ODP preparation. Accept. Need to manage Rural Residential supply to not undermine consolidation approach. Refer Section 2.1.4 Rural Residential – the approach	
16	BJ & JEM O'Keefe, DG & ML Earl, and J Howard & S Nichelsen	16 Burdon Road, Woodbury, RD 21, Geraldine	joybernie@gmail.com	Town Growth	GGA, NR	16.1	SD	The proposed development does not take account the need for housing development in Woodbury. The submitters request the rezoning of Rural 1 to Rural Residential at 16 – 36 Burdon Road, 42 Burdon Road, and 568 Woodbury Road, Woodbury for the following reasons: - Any further development on the land can be easily serviced with on-site wastewater disposal and water supply. - The area is already serviced with garbage collection. - Council would benefit from a greater rate intake. - Development here will attract more people and will meet the Vision statement “A district where land use and growth is sustainably managed to ensure a fantastic lifestyle, thriving economy and strong identity.” - There are existing amenity, community facilities, schools in Woodbury. - It is a desirable area for lifestyle blocks with market demand pressure. - The existing blocks are too small to farm economically but too big for rural residential.	Sub 16.2. Reject. Refer 7.3.1 and Attachment E:4.	
				Strategic Directions	Overall	16.2	D	Do not agree with intensification of housing in town centres.	Sub 16.2. Reject. Refer 12.3.3.4.	
					D1, D2, D7, D8	16.3	A	Agree with these directions as rural residential development in Woodbury will meet the intentions of these directions.	Sub 16.3, 16.4 and 16.5. Accept support for Directions, but reject Woodbury as a Rural Residential option. Refer 7.3.1.	
					D3	16.4	SD	Didn't consider Woodbury.		
					D4, D11	16.5	NN	Woodbury meets the intentions of these directions.		

					AC	16.6	A	Agree there is an increase of aging group and consider these are to be adequately dealt with by the McKenzie Village development.	Sub 16.6. Submission noted.
17	GA Morton Family Trust, and GA & SA Morton	427 & 509 Pages Road, RD4, Timaru	g.morton@mortons.co.nz	Town Growth	TuGA, RRGa	17.1	SA	There is strong demand for Rural Residential land close to town. Current Rural Zone is restrictive and does not taking into account the contour, views etc at times of subdivision.	Sub 17.1 Reject Need to manage Rural Residential supply to not undermine consolidation approach. Refer Section 2.1.4 Rural Residential – the approach
				Strategic Directions	Overall	17.2		Strongly agree particular in regard to Rural Residential developments at 427 & 509 Pages Road, Timaru for the following reasons: - Will meet the market demand for opportunity of lifestyle blocks between 3,000sqm to 2ha with views. - Topography of land could form a natural boundary between Rural Zone and Rural Residential Zones. - The land is easily accessible. - Future developments on the land can be easily serviced by water and telecommunication. - The location of the land is close to essential services and amenities. - The land is currently used for grazing as a dairy support unit and cannot be used for intensive cultivation due to the lack of available irrigation.	Sub 17.2. Part of Kellands Heights Rural Residential notation identified in the DGMS. Density below 5,000m² rejected as outlined in Section 4.5.
18	Rolling Ridges Trust, Russel & Pages Trust, and Simstra Family Trust	C/- 295 Pages Road, Timaru	tim@gressons.co.nz, ashpierce@xtra.co.nz, sandyandpeter295@gmail.com	Town Growth	TuGA, NR	18.1	SD	The extension of Residential Zone on the northern side of Pages Road, Timaru, west of the current zone boundary is not discussed. Rezoning a 50m strip along Pages Road at Lot 3 DP 397906 and 279 & 295 Pages Road, Timaru to Residential 6 is sought for the following reasons: - It provides a transactional zone between Residential 1 and Rural Residential. - The land was zoned Future Urban Development prior to the amalgamation in local government and rezoned to Rural without consulting the landowners. - The land adjoins the existing settlement areas and in close proximity to amenities, recent residential developments, schools and a retirement village. - There is strong market demand for residential properties in this area. - Future development on the land can be easily serviced with existing infrastructure.	Sub 18.1 Reject. Refer Section 12.3.3.5. Note Infrastructure is acceptable. A linear extension and not required for meeting capacity.
						18.2		Would like to see the 80kph zone decreased to 50kph on Pages Road, Timaru where residential use is due to the danger of an pending accident at the intersection of Hunter Hills Drive.	Sub 18.2 Reject. Not a GMS issue too specific, but to be considered by Transport Unit.
						18.3		With regard to the predicted growth: - Residential sales since 2013 has significantly exceeded growth predicted in the Strategy. - It is wrong to conclude that no additional residential land is required for Timaru. The District Plan need to be flexible to accommodate future growth potentials.	Sub 18.3 Reject. NPS-UDC Basis for utilising the NZ Statistics Projections. Growth rates based on the updated 2013 base data are recommended. Accept in Part. Given current level of capacity in Tmaru some additional modest capacity is required.
					RRGA	18.4	SA	Support the Rural Residential Zone and it should recognise the need for a strip of land on the north side of Pages Road, Timaru for residential use.	Sub 18.4 Support noted for Pages Road RR. Noting rejection of Relief Sub 18.1.
				Town Growth	TuGA, GGA, PPGA, RRGa	-	NN	No Comment.	
19	C Wright	55 Hornbrook Street, Temuka	cm5wright@xtra.co.nz		TeGA, NR	19.1	NN	The land to the south of Taumatakahu Stream was rezoned from Rural Residential to recreation. It may now be rezoned back.	Sub 19.1 Reject. Refer Section 12.3.2 and Attachment E:5.

				Strategic Directions	Overall, D1, D2, D3, D4, D5, D6, D7, D8, D9, D10, D11, D12, AC	-	NN	No Comment.	
20	Canterbury Regional Council	PO Box 550, Timaru	julia.forsyth@ecan.govt.nz	Town Growth	RRGA	20.1	SA	Strong agrees with the more focus approach to rural residential development	Sub 20.1 Accept. Refer Section 2.1.4
				Strategic Directions	Overall	20.2	A	Agrees with overall direction and commends Council for the process and endorses the Strategy. Supports move to more active approach. Overall the Strategy gives effect to the Regional Policy Statement.	Sub 20.2 Accept. Refer Section 4.5, Section 6.2.
					D8	20.3		Agrees with the approach to infrastructure. Would like more recognition to address the current and future environmental issues when planning for infrastructure. Accordingly, requests Infrastructure Directive 6 on page 58 of the Strategy to be reworded. Refer to original submission for requested wording.	Sub 20.3 Accept in Part. Refer Section 9.3.5. <i>Directive 6. Manage the adverse effects from infrastructure on the environment, including avoiding further such adverse effects on significant natural and cultural values where practicable; and when designing new infrastructure maintain, and where appropriate enhance the overall natural environment having regard to the efficiency and effectiveness of infrastructure renewal or design.</i>
21	Insights Consultancy	584 Orari Station Road, RD 22, Geraldine	john.shirtcliff@extra.co.nz	Town Growth	GGA, RRGGA	21.1	SA?	The growth in Geraldine area is underestimated as confirmed in correspondence with Statistics New Zealand. As this is the case, the identified future residential growth in Geraldine will be inadequate.	Sub 21.1. Reject. Refer Section 3 and use of NZS2017 Updates.
				Strategic Directions	Overall	-	SA	No Comment.	
					D8	21.2	SD	Seeking full infrastructure costs recovery from developers will compromise development economics. Council will need to adopt a more proactive approach to bring more public sector funding to co-invest and finance initial costs of infrastructure trunk expansion.	21.2 Reject. Refer Section 9. Development is to pay for development, Council to advise on appropriate amount through financial contributions policy.
					D9	-	A	No Comment.	
					D10	21.3	D	What if land owners do not make the land available? Alternatives need to be prepared should this be the case to release land for future growth.	Sub 21.3 Reject. Refer 12.3.1. Council cannot compel a landowner to develop as this will come down to their preferences and the market, However Council cannot over supply and provide infrastructure as this would be inefficient. At present, in the residential sector there is a sufficient supply of land and multiple landowners so that the risk of this approach appears low.
					D12	21.4		Needs to be a more explicit focus / partnership approach upon facilitating development into areas that are in accordance with the Strategy.	Sub 21.4. Accept in part. Refer Section 9.3.1 Approach is to assist with ODP preparation for Rural Residential and assist with comprehensive developments (through public realm improvements) for higher density residential. Issues as to infrastructure costs (DCs/FCs) and getting that balance correct will always be contentious
					AC	21.5		Population assumptions are flawed. Population likely to grow more strongly than forecast.	21.5 Reject. Use of NZS Projections is appropriate, acknowledging updated projections for use in GMS.
22	N Gilkison	Flat A, 176A Wai-iti Road, Highfield, Timaru	email@universalfarm.co.nz	Town Growth	TuGA, NR	22.1	SA	Agree with the approach. However, the Strategy is targeted for a very long time period. It should also look at other potential areas of residential and business growth should the growth be greater than current forecasts.	Sub 22.1 Accept in part. GMS includes monitoring clauses to be responsive should growth projections change.
					GGA, PPGA, TeGA	-	A	No Comment.	
					RRGA	-	SA		

				Strategic Directions	Overall, AC	22.1	A	Support the consolidation of existing settlement areas where existing facilities and infrastructures are located. However, the Strategy should consider options in the circumstances that if growth is underestimated or overestimated.	Sub 22.1 Accept in part. GMS includes monitoring clauses to be responsive should growth projections change.
					D1	22.2	A	Retention of important heritage buildings should also be a priority.	Sub 22.2 Accept in part. Heritage retention will be a specific requirement under the RMA and District Plan. However, this will not mean retaining heritage at all costs.
					D2	22.3		In addition, there should be a focus on identifying, cleaning up and managing degraded natural habitats.	Sub 12.3. Acknowledge Section 10. Both regulatory and non-regulatory will need to be considered. There is also a mandate in the Canterbury Regional Plans to promote restoration.
					D3	22.4	SA	The Strategy should also consider where to accommodate potential growth which exceeds the forecasted level.	Sub 22.4 Agreed hence Options assessment has been completed which identifies additional areas should these become appropriate.
					D4	22.5	A	The Strategy should also look at resilience to man-made hazards e.g. climate change, degradation of natural environment by man.	Sub 22.5. Agreed , which is why this forms a Strategic Direction in of itself, focus in DP provisions will also be on Natural Hazards and new requirements in CRPS and MfE re Sea Level Rise.
					D5	-	SA	No Comment.	
					D8	-	A		
					D6	22.6	NN	To be sustainable, it is critical that the natural environment is not adversely impacted by developments.	Sub 22.6. Accept. Approach of the GMS will be focused on the relevant statutory requirements, chiefly the RMA and Sustainable Management, requires a balance between enablement and mitigation, Section 6 Matters for Natural Environment and Bottle lines do have some primacy.
					D7	22.4 22.7	A	The Strategy should also consider how to handle potential growth which exceeds the forecasted level. Should consider future public transport and promote greater use of them.	Sub 22.4 & 22.7. Accept
					D9	22.6		In addition, all development should be environmentally, economically and socially sustainable.	Sub 22.6. Accept
					D10	22.8	SA	The promotion of mixed use, walkable neighbourhood is a key element.	Sub 22.8. Accept Will be the focus in Residential Intensification Areas, difficult to achieve given static growth and much of the residential stock to 2048 is already in place - retrofitting difficult.
					D11	22.9	A	Also need to ensure the function and quality of open spaces are key design elements.	Sub 22.9. Acknowledge In addition, the Timaru District Council Parks Strategy (2012 – 2022) manages this matter.
					D12	\$22.10		More and better pro-active consultation and engagement with key stakeholders is required.	Sub 22.10. Reject.
					Consultation and Collaboration	22.11	N/A	There has not been enough engagement with the public and key stakeholders in the drafting process. Further pro-active consultation and engagement directly with the public and key stakeholders is required in the process.	Sub 22.11. Reject.
23	P Brown	55 Hayhurst Street, Temuka	pbrownie@slingshot.co.nz	Town Growth	TeGA, NR	23.1	A	The recreation land that borders the Tuamatakahu Stream should be rezoned residential to reflect the current use as they contain houses.	Sub 23.1 Reject. Refer 12.3.2 and Attachment E:5.
					RRGA	-			
				Strategic Directions	Overall, D1, D2, AC	-		No Comment.	

24	Seadown Properties Limited	19 Seadown Road, Washdyke, Timaru	shane@washingtons.co.nz	Town Growth	TuGA, NR	24.1	N/A	The submitter requested Lot 6 DP 578 be rezoned from Rural to Light Industrial in two stages for the following reasons: - The Options Report has rated 'Laughton area' with the highest rating for Industrial Growth Options in Washdyke. - The Options Report concluded that no additional industrial land is required due to the available land in Washdyke area. However, it did not taking into account that existing land owners are land banking and not willing to develop the land. Therefore, there is actually a lack of industrial land available on the market.	24.1 Accept. Refer Section 6.3.2.
25	South Canterbury Federated Farmers of New Zealand	57A Theodosia Street, Timaru	bdouglas@fedfarm.org.nz	Town Growth	TuGA, TeGA	25.1	SA	Strongly agree with the predicted residential demand and modest increase in housing density over the next 30 years. In particular, consider the Strategy has provided adequate allowance to accommodate demand for rural lifestyle residences. The changing to aging population suggests that there will be a greater demand for smaller low-maintenance properties which are closer to services.	25.1 Accept. Refer Section 4.5.
					GGA	25.2	A	Agree with the predicted residential demand and modest increase in housing density over the next 30 years. In particular, consider the Strategy has provided adequate allowance to accommodate demand for rural lifestyle residences. The changing to aging population suggests that there will be a greater demand for smaller low-maintenance properties which are closer to services.	25.2 Accept. Refer Section 4.5. An aging population, and the composition of households to also likely change, with a proportional decrease in 'family households' and an increase in 'one-person households' ¹ which decreases proportional demand for space extensive rural residential properties.
								However, have some reservations if the change in zoning from Rural 2 to Residential were to proceed on productive land on Orari Station Road, Geraldine.	Sub 25.2 Reject. Preferred in Options Assessment.
					PPGA	25.3	A	Generally agree with the approach. However, question the need of proposed new Rural Residential at Manse Road given: - The overall size of the township and sections in town are generally larger than other urban centres. - There is sufficient vacant and large residential zoned allotments in the existing settlement area to accommodate the predicted residential growth to 2028.	Sub 25.3. Reject. Prudent to provide a Rural Residential zoned opportunity given likely market demand.
					RRGA	25.4	SA	Support the Direction for a more focussed approach to rural residential development, however, oppose in principle to the conversion of valuable productive land to other uses without very good reason.	20.1 Accept. Refer Section 2.1.4
				Strategic Directions	Overall	25.5	A	Agree with the Directions overall and consider it is a pragmatic approach. The essential need for such pragmatism is the identification of an aging population for the District.	Sub 25.5 Agreed but focused approach replaces current dispersed exemptions approach - there is a need to demonstrate that the community demand for Rural Residential in the district can still be met.
					D1	25.6	SA	Strongly agree, in particular support "(iii) the retention of the character and productive capacity of rural areas".	Sub 25.6 Accept Support Acknowledged
					D2	25.7	A	Generally support the Direction, however, consider the provision of esplanade, in particular with access values, should include consultation with landowners over private land, unless over land that Council is taking full responsibility.	Sub 25.7. Accept. 'Rural Landholders' is recommended to be inserted as a Support Agency for actions A2.1, A2.2, A2.3 and A2.4.
					D3, D9, D10	25.8	SA	Strongly agree with these Directions, in particular the minimum need of urban expansion.	Sub 25.8 Accept Support Acknowledged.

¹ Growth Options Assessment. Section 1 – District Growth Assumptions. Figure 1.5: Natalie Jackson, University of Waikato.

					D4	25.9	A	As a result of the change to aging population, an increasing number of the District's population will be on fixed income, any enforced expense over CPI rates (1.3% to the December 2016 year quarter) will not contribute to the building of resilient communities. This means that raise in property rates (56% nation-wise) is not going to support this Direction. Although it is a matter for the Long-term Plan to deal with, the submitter suggests a change to Direction 4(ii) to include building resilience is within the financial capacity of its citizens. Refer to original submission for requested wording.	Sub 25.9 Reject. Refer Section 11.1 Remains an issue for LTP.
					D5, D11	25.10	A	Agree with these Directions.	Sub 25.10 Accept Support Acknowledged
					D6	25.11	A	This is someway repeating Directions 1 and 3. Also have concerns of the use of the word 'support', considering 'encourage' may be more appropriate.	Sub 25.11 Accept. Refer Section 6.1. Agree that ' encourage ' would more appropriate given likely DP provisions and servicing.
					D7	25.12	A	While recognise the importance of the Port and the importance of access to the port, access to the port via Timaru town has an adverse effect on the locals. This access need to be improved and should be singularly identified in Table 9, by conclusion in action 7.6.	Sub 25.12. Reject, Refer Section 8.3.2.
					D8	25.13	NN	Agree that infrastructure is Council's responsibility. However, there are National Policies Statements demanding local community's responsibility to protect infrastructure and some national infrastructure operators sought to impose further restriction on local communities. The Strategy should indicate Council's willingness to fulfill its national obligations while, defending the rights of its own citizens. Infrastructure Directive 5 should be reworded to recognise this requirement. Refer to original submission for requested wording.	Sub 25.13. Reject. Refer 9.3.3
					D12	25.14	SA	Strongly agree with the collaborative approach of this process and is willing to further participate in the process.	Sub 25.14. Support Noted.
					AC	25.15	D	Agree with approaches (a) & (b) and disagree with approach (c). There are many controls imposed on selected sections of the community through the RMA and other legislations. It is the submitter's belief that the costs of any control imposed by a community on a single sector, should be paid for by that community. It is suggested that the words 'do not fall predominantly on the wider community' are deleted from C:2(3) of the Strategy.	Sub 25.15. Reject.
26	J Scott	82 Smart Munro Rd, 4 RD, Timaru	jscott@es.co.nz	Town Growth	PPGA, NR	26.1	A	Agree with the approach but considers that new Rural Residential zone adjoining Manse Road, as shown on public notice should follow land boundaries to include all the land between Manse Road, Smart Munro Road and a paper Road joining the two roads. As one of the landowners within the identified rural residential area, was not consulted. Pre consultation should take place prior to such a document was developed.	26.1 Reject. Refer 7.3.1. Growth Options and analysis provided to TDC that considered this area. Also note that the extent of Rural Residential supply would not require both sites.
				Strategic Directions	Overall, D1	-	NN	No Comment.	

27	R Payne	73 Muff Road, Orari, RD 26, Temuka	rogerpayne@scorch.co.nz	Town Growth	NR	27.1	N/A	<p>Future growth in Orari is not addressed. The former railway land at Orari is no longer in private hands and should be promoted for light industrial use given:</p> <ul style="list-style-type: none"> - It can be easily accessed. - It can be easily serviced with water, power, sewer. - It has the potential to provide any required car parks. 	27.1 Reject. Refer Section 5.4 and Attachment E:2
28	R Hay	101 Te Ngawai Road, Pleasant Point	hayfamily@kinect.co.nz	Town Growth	TuGA, GGA, TeGA	-	NN	No Comment.	
					PPGA, NR	28.1	SD	<p>There is strong demand for rural lifestyle blocks in Pleasant Point.</p> <p>Submitter had to search two years to find the lifestyle block in Pleasant Point.</p> <p>101 Te Ngawai Road, Pleasant Point is 1.8ha in area, zoned Rural but not financially viable to be run as a rural unit. It adjoins a residential development where sections were sold and developed very fast. It is a very popular area for new homes / families.</p>	Sub 28.1 Reject. Refer 7.3.1. Area adjoins existing urban area to south east, and has direct access to Te Ngawai Road. Issues of flooding and intensification to be considered firstly. Would also create a spot zone RR, although current size and likely activities would be more RR in nature.
					RRGA	28.2	SD	The ability for families to have a lifestyle property is essential for rural communities. The submitter thoroughly encourages the provision of lifestyle blocks.	Sub 28.2 Reject. Need to manage Rural Residential supply to not undermine consolidation approach. Refer Section 2.1.4 Rural Residential – the approach
				Strategic Directions	Overall	28.2	SD	Development of additional good sized and attractive residential or rural residential properties within the area is crucial to maintaining and growing communities. There is strong demand for this type of property that it is to be encouraged.	Sub 28.2 Reject. Section 4 outlines the approach for Rural Residential zones in terms of the higher order statutory framework.
					D1, D2, D5, D12, AC	-	NN	No Comment.	
					D3	-	SD		
					D4, D11	-	SA		
					D6, D7, D9	-	A		
					D10	-	D		
29	H Henderson			Town Growth	TuGA	29.1	SD	Strongly disagree with multi storey apartments near to central city as they will bring further shading, block views, and have limited amenity and infrastructure in the centre. Why not consider greenfield development with the provision of shuttle bus services.	Sub 29.1 Reject. Approach as to consolidation focus of Chapter 5 RPS.
					RRGA	29.2	SA	Strongly agree with development at outskirts of city.	Sub 29.2 Noted.
				Strategic Directions	Overall	29.2, 29.1	D	<p>Agree with expansion on the outskirt of city.</p> <p>Strongly disagree with high rise apartments near city centre. Where will facilities for older people be, meeting spaces etc.</p>	Sub 29.2, 29.1 Reject. CRPS outlines benefits of consolidation and integration of infrastructure, importance of getting design and open space requirements balanced with intensification. Also, this is intensification for Timaru not Auckland CBD.
					D1	29.1	SD	The character of Timaru or South Canterbury is not dense housing or high rise apartment living.	Sub 29.1 Acknowledged. Note from pg 62 of the DGMS: <i>High density apartments of three or more storeys that may be appropriate in Auckland or Tauranga would not only be incongruent in Timaru, but also unlikely to gain market support.</i>
					D2	29.3	D	Strategy seems to want less landscaping and parkland areas.	Sub 29.3 Reject. Requirements will be addressed in District Plan provisions.

					D3	29.4	D	Agree with stopping ribbon development into productive farmland. Disagree with intensification of near city areas.	Sub 29.4 Support Acknowledged for reducing ribbon development. Consolidation (and intensification close to the city centre) is a requirement of the CRPS (Objective 5.2.1).
					D6	-	N/A	Older persons contribute - it is not all 'take'.	
					D7	29.5	SD	Crossing SH1 as a pedestrian is a joke. Trucks need to be relocated and use the railway more.	Sub 29.5. Accept in part , Refer Section 8.3.2.
					D8	29.5	N/A	Roading is a serious problem. Council blames State Highway system but surely united action plans can be agreed. Too many trucks on the road in town no wonder tourists leave quickly.	
					D10	29.6	N/A	Little consideration is given to streetscape.	Sub 29.6. Reject Too specific.
					D11	29.6	SD	People need their own space and it must be preserved as well.	Sub 29.6. Acknowledged.
					D12	29.7	N/A	Council should be able to influence or have a say and communicate with NZTA for roading, Ecan for log burners and SCDHB for keeping elderly in their homes.	Sub 29.7. TDC can only advocate on behalf of its residents. Mandate for these matters lies with those agencies.
					AC	29.8	N/A	Envisage what Timaru city area will look like if development occurs in accordance with the Strategy in 2043.	Sub 29.8. Acknowledged.
						29.9		Retention of some historic precincts, including buildings built for resilience not for 20-30 years.	Sub 29.9. Acknowledged.
						29.10		Botanic Gardens are extremely under used.	Sub 29.10. Acknowledged.
				Administration	Corruption	29.11	N/A	All Council staff and Councillors should have no financial gain or have to declare land banking or any property which would be affected by the implementation of this draft strategy.	Sub 29.11. Reject. Refer Section 11.3.4.
30	A White	120 Cox Street, Geraldine	homefarmw@xtra.co.nz	Town Growth	TuGA	30.1	NN	Future growth in Timaru depends on a number of variables: population growth, available options and how Timaru may attract people to come and stay.	Sub 30.1 Statement. Refer Section 3.
					PPGA, TeGA	-	NN	No comment.	
					GGA, NR	30.2	D	The submitter requested rezoning of 120 Cox Street, Geraldine for rural residential for the following reasons: - Cox Street is part of the greater Geraldine area. - Amenities e.g. power, sewerage are there. - Lack of available sites for people wanting an acre for lifestyle reasons. - Was zoned rural residential under the old Strathalan County.	Sub 30.2 Reject. Refer 7.3.1.
					RRGA	30.2	A	People chose life style to live in a country area with a little bit of country.	
				Strategic Directions	Overall, AC	30.3	A	All future growth in Geraldine is located to the northern side of the river. The southern side was not considered. Balancing act as outline towns within the District need as much consideration as Timaru. Sometimes this is not the case.	Sub 30.3 Statement. No comment.
					D1, D3,	30.3	D	Most growth is located on the northern side of the river in Geraldine. This may result in unbalanced development and inequity in town.	Sub 30.4 Statement. No comment
					D2, D4, D6	-	A	No Comment.	
					D7	30.4	NN	Footpath is critical to locals and tourists. Would like footpath be provided outside the 100km on Cox St.	Sub 30.5 Statement. To specific for GMS.
					D8	30.5		On-going assessment with infrastructure demand is required with the growing population and tourists.	Sub 30.5. Accept in part. Refer Section 9. Note purpose of the GMS is to account for such growth.

					D9, D10	30.6		Further residential growth on the outskirts of town down Cox Street is sought.	Sub 30.6 Reject. Refer 7.3.1.
					D11	30.7	A	Love to see open spaces in town with playing areas and recreation.	Sub 30.7 Statement. No comment
					D12	30.8	A	Great to know consultation approach is taken by Council.	Sub 30.8 Statement. No comment
31	Al Young	583 Orari Station Road, RD 22, Geraldine	ashburyfarm@gmail.com	Town Growth	GGA, NR	31.1	N/A	The proposed Orari Station rural residential area and residential deferred area would significantly affect the submitter's property at 583 Orari Station Road, in particular in regard of water supply and sewer disposal. Such effects will affect the property value as well as its ability to operate as a large farm.	Sub 31.1. Acknowledged but noted that this was the preferred area through the Options Assessment.
								Ruakapuka Stream is a flood path if the Waihi River breaches its bank between the town and bridge over the Waihi River to Woodbury. The Stream should not have any impediments placed on the waterway, including the Cascade Place Rural Residential area.	
								Sewer disposal and water supply will be problematic on 5,000sqm sections in this area.	
								Disagree with Tiplady Industrial rezoning.	
				Strategic Directions	Overall, NR	31.2	N/A	No industrial area should be located between the Denfield Golf Course and the Orari Racecourse.	Sub 31.2. Reject. Refer 6.3.2
								Industrial areas should be located close to main highway.	
32	Al Young, Martock Holdings Limited, N Campbell, NL Newton, Mountain View Dairies, D & M Sheppard, R Taylor, and P Hobbs	583 Orari Station Road, RD 22, Geraldine	ashburyfarm@gmail.com	Town Growth	Infrastructure	31.3	N/A	The strategy fails to include community drinking water protection zones.	Sub 31.3. CRC Responsibility.
								The existing dispersed rural lifestyle development has resulted in conflicts with farming operations.	Sub 31.4 Accept approach in terms of targeted Rural Residential development (refer 2.1.4). Development at Orari and Woodbury recommended to be rejected – Refer Section 5.
								Rural Residential in Orari and Woodbury should also be considered.	
32		583 Orari Station Road, RD 22, Geraldine	ashburyfarm@gmail.com	Town Growth	Infrastructure	32.1	Community Drinking Water Zone	Council has in the Geraldine area five community drinking water zones. Four of these bores are located west of Orari township, between the Waihi and Orari Rivers. These wells are shallow (less than 10m in depth) except for one bore at Orari that might be a deep bore (30-70m in depth). Shallow bores require a protection zone of 2,000m while deep bores require a protection zone of 500m. The shallow bores need to be deepened to below the 30m threshold to maintain good water quality, and considerably reduce the restriction zone placed on landowners.	32.1 Reject. Refer Section 9.

33	N Robertson	245 Downs Road, RD 21, Geraldine		Town Growth	RRGA, NR	33.1	A	<p>Generally agree with the approach. However, consider rural residential should not be placed at high value productive land on Orari Station Road and Main North Road. Instead, land with lower productive value but high aesthetic value should be further developed.</p> <p>The submitter requested consideration of 22ha land at 245 Downs Road, Geraldine for rural residential development for the following reasons:</p> <ul style="list-style-type: none"> - Geraldine Downs already has rural residential development on the northern facing areas and further development in this area would have little visual impact on amenity and landscape values. - There are many north facing areas that is suitable for housing with great views. - There will have little or no impact on neighbouring properties. - The land is unlikely to ever be a standalone productive farm unit. - There is market demand for lifestyle blocks of around 5.5ha. 	<p>Sub 33.1 Reject Disparate from existing urban boundary will not meet CRPS criteria as to attachment to urban boundary and consolidation. Refer Section 4.3.</p> <p>Attachment E:1 Matrix of Sites Assessment – Detached Assessment.</p>
34	KiwiRail Holdings Ltd	PO Box 593, Wellington	Rebecca.Beals@kiwirail.co.nz	Strategic Directions	Overall	34.1		Generally supports the Strategy including various aspects that help protect the rail network as a strategic transport network. Only amendments requested below.	Sub 34.1 Support noted.
					D2	34.2		Add an element of practicality in Strategic Direction [2] Landscape and Amenity (ii) an option being to word it ' <i>improve amenity and design particularly in urban areas where practicable</i> '. The reason for this request is that improving the amenity around rail corridors may not be possible for public safety and operational reasons.	Sub 34.2 Reject. Refer 10.1. SD8 already provides for practicality in terms of role and function.
					D7	34.3		Include the rail network in the fifth bullet point on page 37 Table D:1.5.	Sub 34.3 Accept insert "rail" into 5th Bullet Point
					D9	34.4		Refer to rail in the support agency column for A9.4 and A9.5 in Table 11 in rural actions as rail is also subject to reverse sensitivity effects.	Sub 34.4 Accept , however KiwiRail is already present as a Support Agency.
35	Foodstuffs South Island Limited	145 Wai-iti Road, Highfield, Timaru	chris.fowler@adderleyhead.co.nz	Strategic Directions	TuGA	35.1		Supports the reinforcement and consolidation of existing commercial centres and the priority intensification of the Highfield area.	Sub 35.1 Accept. Refer Section 5.3.
						35.2		Opposes the blanket restriction on additional commercial land within the District.	Sub 35.1 Accept. Refer Section 5.3, noting that there is no blanket restriction.
						35.3		Requests that the Strategy allows for the future expansion of existing commercial centres and those centres are identified so that existing commercial centres can respond to the increased demand brought about by residential intensification.	Sub 35.1 Accept in part. The DGMS does not impede centre expansion as necessary, but does not nominate areas of centre expansion into Residential zones as based on current commercial area surplus.
						35.4		Specific amendments to pages 15, 21, 32, 53, 63, 74, 75. Refer to original submission for requested wording.	Sub 35.4. Reject Section 6.3.1. Property Economics Report (Attachment A) identifies sufficient commercial land to 2048, why would TDC then include an expansion policy in the DP for its 10 year cycle.
36	RP & PB Simmons Trustee Co Limited	29 Oakwood Road, Timaru	admin@mfinz.co.nz	Town Growth	TuGA, NR	36.1		<p>The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.</p> <p>Predicted growth is too conservative.</p>	Sub 36.1. Reject Refer 12.3.1.

						36.2	<p>The submitter request own property at 29 Oakwood Road, Timaru be rezoned Rural Residential for allotments between 0.5ha - 2ha for the following reasons:</p> <ul style="list-style-type: none"> - The predicted Rural residential growth in Timaru artificially low and more land is needed for rural residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Ashburton District significantly enables more Rural Residential development on the fringe of Ashburton than Timaru District even though it is 30% smaller in population. - The ease of servicing the land. It would be preferable for a Council initiated and maintained low pressure pumped sewer main to service this area (and beyond). - The land is close to existing settlement area. - The property is unique within the district with its proximity to Gleniti Golf Course and spectacular northerly views. 	<p>36.2 Reject. Refer Section 4.5. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.</p>
					RRGA	36.3	<p>The predicted Rural Residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p>	<p>36.2 Reject. Refer Section 4.5 Continuation of District Plan approach to rural residential in Timaru is not supportable given changes in CRPS. Approach is to provide RR in focused areas to meet enablement demands <u>and</u> achieve consolidation.</p>
37	S Smith, Booker, Irvine, Watson, Moir and Leonard	Land bounded by Rosebrook Road, Hadlow Road and Brockley Road	Steve_W_Smith@bnz.co.nz	Town Growth	TuGA, NR	37.1	<p>The land in excess of 10 ha bounded by Rosebrook, Hadlow and Brockley Road be considered for subdivision down to 5 ha and should be zoned 'Hadlow Lifestyle Subzone'. The reasons given for the request include:</p> <ul style="list-style-type: none"> - It's a premium lifestyle area. It will provide for lifestyle choice and attract and retain people. - It will provide an affordable supply. - It won't constitute rural sprawl. - It won't detract from the rural aesthetic. - There won't be a loss in economic capacity. - It won't require any further investment by council. - Additional rates would be provided. - Soil is suitable for disposal to ground. 	<p>37.1 Reject. The proposed submission seeks a high(er) density rural character with subdivisions allowed down to a minimum of 5ha where the parent allotment exceeds 10ha.</p> <p>The proposal is more aimed at rural density than a growth strategy, per se. Increasing intensity of rural allotments disparate from the urban boundary is not consistent with CRPS Policy 5.3.1.</p>
38	Alpine Energy Limited	PO Box 530, Timaru	paul.christie@alpineenergy.co.nz	Town Growth	Overall	38.1	Overall support for the GMS and infill housing.	Sub 38.1. Acknowledged.
				Strategic Directions	D8	38.2	<p>Electrical infrastructure may not have the required capacity for the future demand requiring investment in the network. Adjusting capital contributions for the time value of money is offered as solution.</p> <p>Purchasing of a subdivided lot are often unaware that they may have to pay for a connection to the electrical network. Informing purchasers that the lot does not have a connection to the electrical network is offered as a solution.</p> <p>Subdivisions in peri-urban areas can be piecemeal and adds additional costs if connections are not supplied at the same time. Suggested solution to require developers to connect to the network at the time of subdivision.</p>	<p>Sub 38.2 Agreed that this needs to be communicated through DP / Infrastructure Code or Guideline, too specific for GMS</p>

39	P & L Bartrum	4-8 Rayner Street, Pleasant Point	pleasantpointhoney@gmail.com	Town Growth	PPGA, NR	39.1		Requests their land at 4 Rayner Street, Pleasant Point, to be rezoned from rural to residential. This is requested on the basis that: - a lot of residential land in Pleasant Point is either not available or is not suitable for development; their site is proximate to the existing urban boundary; - complies with the Regional Policy Statement; - is accessed directly from Smart Munro Road; would only result in a minor loss of productive land; would provide a suitable transition from residential to rural; scores well against the GMS criteria; can potentially be serviced; and -flooding is minimal. In respect of the site's flood hazard potential the submission notes that the problem that caused flooding of the site in 1986 has been fixed.	Sub 39.1 Reject. Refer 12.3.1.
40	New Zealand Transport Agency	PO Box 1479, Christchurch	planning-christchurch@nzta.govt.nz	Strategic Directions	Overall	40.1		The submission is in general support of the Strategy but with the following amendments requested.	Sub 40.1. Support noted
					D6	40.2		General agree with the direction but request the listing of NZTA as a support agency for action A6.2.	Sub 40.2 Accept
					D7	40.3		Generally agree with this direction but request the following amendments: - Amend transport directive 3 to avoid sensitive activities establishing in proximity to the transport network. - Amend transport directive 5 to encourage alternative modes of transport. - Amend explanation E:2.7 to refer to the one network road classification system. - Amend E:2.8 to refer to the transport network and the state highway network.	40.3 Accept in Part. Refer Section 8.3.3
41	Community and Public Health	PO Box 510, Timaru	daniel.williams@cdhb.health.nz	Strategic Directions	Overall, D2, D4, D5, D7, D8, D10, D11	41.1		The submitter supports the Strategy and in particular Strategic Directions 2, 4, 5, 7, 8, 10, 11.	Sub 41.1. Acknowledged.
42	Ministry of Education	Wellington	paul.whyte@beca.com	Strategic Directions	D3	42.1		Council to consider how it will manage new activities in the vicinity of existing schools so that the efficient operation of schools is not affected.	Sub 42.1. Reject. Also depends on location of schools and basis of its protection, presumably these are designated in which case they are protected for Education activities as specified in the purpose of the Designation.
					D7	42.2		Council to consider measures to mitigate increased traffic impacts on schools in areas of identified growth.	Sub 42.2. Reject. Too specific for GMS but issued to Transport Unit.
					D8	42.3		Council consider implementing sustainable and safe walking and cycling connections from identified growth areas and existing schools	Sub 42.3. Reject. Too specific for GMS but issued to Transport Unit.
					D11	42.4		Council and the Ministry to discuss the potential for co-sharing facilities including open space and community facilities.	Sub 42.4. Reject. Governance Function
					D12	42.5		The submission requests the Council consult and work with the Ministry in respect of identifying the need for new or extended education facilities in areas of identified growth.	Sub 43.4 Reject There is no areas of new growth.

43	GA & JL Ward and Footes Trustees Limited	264 Beaconsfield Road, Timaru	admin@mfinz.co.nz	Town Growth	TuGA, NR	43.1	<p>The submission requested the site to be incorporated into a 'Salisbury' Rural residential area that would have a total area of 29.93ha with minimum allotment size of between 0.5ha and 2 ha. The basis for this request is that:</p> <ul style="list-style-type: none"> - The land is proximate to Timaru. - The land is accessible from sealed roads. - Can be readily serviced. - Is not subject to flood hazards and does not have versatile soils. - Is already developed at peri-urban densities and therefore aligns with Regional Policy Statement. 	Sub 43.1 Reject. Refer Section 4.3. Considerable distance (3.8km) from urban boundary. No ability to distinguish if zoned with other sized allotments.
						43.2	<p>The submission questions the Strategy growth projections for rural residential development and suggests demand for rural residential development will be far higher than predicted. The predicted rural residential growth in Timaru is based on building consents figures, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>The submission disagrees with the Strategy direction to achieve 75% Residential to 25% Rural and Rural Residential split as rural residential growth is underestimated.</p>	43.2 Reject. Refer Section 2.2.2.4. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.
44	PSE Properties 2012 Limited and Hilton Haulage Limited Partnership	68, 70, 72 and 86 Sheffield Street, Washdyke, Timaru	admin@mfinz.co.nz	Town Growth	TuGA,NR	44.1	<p>The submission seeks to extend the Industrial H Zone to the east to include all of 72 and 86 Sheffield Street, which is currently zoned Rural 3. The main basis for this request is the predicted increase in rural production leading to increased demand for industrial land, particularly storage and transport services.</p> <p>The submission also states that the land is well serviced for vehicle access and other essential services. The submission suggest that the areas coastal flooding issue can be dealt with by minimum floor levels.</p>	Submission 45.1 Reject due to hazard risk. Refer 6.3.2.
45	Juice Products New Zealand Limited	55 Sheffield Street, Washdyke, Timaru	admin@mfinz.co.nz	Town Growth	TuGA, NR	45.1	<p>The submission seeks to extend the Industrial H zone to the east to include all of the site. The main basis for this request is that:</p> <ul style="list-style-type: none"> - The rezoning would accommodate further industrial growth associated with the submitter. - The land is well serviced for vehicle access and other essential services. <p>The submission suggest that the areas coastal flooding issue can be dealt with by minimum floor levels.</p>	Submission 45.1 Reject due to hazard risk. Refer 6.3.2.
46	South Canterbury Chamber of Commerce	PO Box 919, Timaru	fiona@scchamber.org.nz	Town Growth	TuGA	46.1	<p>The Chamber requested Council to consider an extension to the consultation timeframe as concerned there has been insufficient time to develop and collate data from a range of industries.</p>	46.1 Accept An extension was provided
							<p>The Chamber's main concern is that the information presented appears to be a forecast of stagnation. The Chamber believes growth will be greater</p>	46.2 Reject Statutory basis to the use of the NZ Statistics NZ Population Projections through the NPS-UDC. Refer Section 1.3.5 and Section 2.2.3

						46.2	<p>and that the Strategy should be seeking to attract growth. The Chamber's view that growth will be greater is based on: their real experiences; further irrigation from Hunter Downs; investment in the Port; and tourism; which may not have been accounted for in typical Stats NZ projections.</p> <p>The Chamber requested Council to reconsider the current statistical data being used, factor in recent growth, prepare scenarios modelled on the likely expansions and growth. Council is also encouraged to be more proactive in encouraging development. The submitter suggests that the land that is perceived to be available is far less than is viable and actually available for development.</p> <p>The submitter recommends a two stage approach ensuring there is an ambitious growth plan mapped out (using deferred zones) and a separate model for infrastructure and investment should growth occur. Consideration needs to include current growth and actual viable available land and acknowledge that many families who choose to settle in the District like Timaru do so because of the choice of rural and lifestyle properties.</p> <p>It is suggested that the goal of the District Plan should be to enable investment at least to the extent matched by other South Island districts.</p> <p>The Council should invest ahead of developers to ensure sites are available for a range of activities so that services are always immediately available.</p>	Industrial Land. Refer Section 5.5. For the Timaru District, as outlined by Property Economics (Attachment A) there is more than sufficient zoned Industrial land, at the macro district level to meet the 10 year (medium term) and 30 year (long term) demand. At a District level, the Industrial market is not constrained.
47	Majors Development Limited	1 Mckechnie Street, Geraldine	admin@mfinz.co.nz	Town Growth	GGA, NR		<p>The submission relates to 1 Mckechnie Street, Geraldine, which currently accommodates Madsden Engineering Ltd, who operates a modern workshop, retail store and associated offices. The submissions seeks to rezone the site from Residential 1 to Industrial L in order to address the shortage of industrial land in Geraldine. The submission notes that the properties to the north and east are zoned Industrial L and therefore rezoning the site will provide for continuity of zoning and further meet the goal of the Strategy of consolidation.</p>	Sub 47.1 Accept. Refer 6.3.2. The Industrial zoning would be consistent with consolidation approach in CRP5.2.1, site can be serviced (CRPS 5.3.5 which seeks efficient servicing for development, including sewer and water), and would result in a defensible Industrial L boundary. Controls would need to be imposed prior to rezoning given interface with adjoining residential and need to retain amenity. Traffic controls necessary given the narrow nature of the road network.
48	SM Fraser, AJ Shaw and PA Johnston	45 Washdyke Flat Road, Washdyke	admin@mfinz.co.nz	Town Growth	TuGA, NR	48.1	<p>Predicted growth is too conservative. Believe the NPS-UDC forecast for industrial land needs to be exceeded, with additional industrial land at Washdyke necessary.</p> <p>The submitter requested own property at 45 Washdyke Flat Road, Washdyke be rezoned Industrial for the following reasons:</p> <ul style="list-style-type: none"> - There is insufficient industrial land. - The land is readily achievable with essential services for light industrial. - Flood risk has been mitigated with recent upgrading of Washdyke Creek. - The land is located immediately west of the existing industrial area. - Was considered in the option report. 	48.1 Reject. Refer Section 6.3.2

49	McFarlane Family Trust	49 & 63 Connolly Street, Geraldine	johnny.mcfarlane@beca.com	Town Growth	GGA, NR	49.1		<p>Identify 49 & 63 Connolly Street, Geraldine as a residential growth area and rezone the Rural 1 and Rural 2 land to Residential 1 for the following reasons:</p> <ul style="list-style-type: none"> - It would achieve a consolidated pattern in Geraldine. - It adjoins the proposed Cascade Place Rural Residential and would provide a transitional zone. - It is not productive. - It is contiguous with existing infrastructure networks and services and would only place low demand in infrastructure. - Ease to access by road, cycle way and walkways. - Close to town centre and McKenzie Lifestyle Village. - There will be limited reverse sensitivity effects resulting from existing Rural 1 which can be addressed by the provision of landscaping. - Single landowner, easy to manage. - No known natural hazard. 	Sub 49.1. Reject, noting in isolation finely balanced. Refer Section 12.3.3.5.
50	SM Fraser, AJ Shaw and PA Johnston	54 & 56 Timaru-Pareora Highway, Timaru	admin@mflnz.co.nz	Town Growth	TuGA, NR	50.1		Seek the rezoning of 54 & 56 Timaru-Pareora Highway, Timaru from the current split Rural 1 and Rural 2 Zones to being fully zoned Industrial L. Activities at the site currently include Heartland Haulage Ltd, Aoraki Alternative Education Centre and Family Friends Timaru (pet crematoria).	50.1 Reject. Refer Section 5.4 and Attachment E:2.
						50.1		Zoning request be considered both in terms of the Growth Management Strategy and the Timaru District Plan Review.	Sub 50.2 Reject. Different process, the respondent should be advised that they will need to lodge a formal submission to DP process
51	Port Bryson Property Ltd	16-18 Hilton Highway, Timaru		Town Growth	TuGA, NR	51.1		Seeks the rezoning of the land at 16-18 Hilton Highway, Timaru for 'business park use', being Commercial, with special reference to business park activities. Activities at the site currently include commercial /industrial uses.	Sub 51.1 Accept in part for 16 Hilton Highway only . Refer Section 6.3.2.
52	B Pipe	383 Gleniti Road, RD 4, Timaru 7974		Town Growth	TuGA, NR	52.1		<p>The scoring system used to select future growth area has errors and asks that Council reviews its forecast demand for rural residential lots to ensure sufficient land is zoned to match demand.</p> <p>Specifically, Council should look at Hadlow and Oakwood Road, Timaru in the options report.</p>	52.1 Reject considerable distance (4.5km) from urban boundary. No ability to distinguish if zoned with other sized allotments.
				Strategic Directions	AC, D1, D3, D9, D11	52.2		<p>The Ryder Report seriously understates the demand for rural residential lots concluding that 330 dwellings will be required adjacent to Timaru for the period to 2045.</p> <p>The submitter outlines a 'conservative forecast' which estimates 900 dwellings are required.</p>	Sub 52.2 Reject. Such an approach would provide for 50% of the Timaru District's 30 year (2048) household demand of 1,800 households through Rural Residential provision.

53	Heritage New Zealand Pouhere Taonga	PO Box 5467, Dunedin	jodea@heritage.org.nz	Strategic Directions	Overall	53.1		Overall support for the Strategy, in particular the 'managed growth' with recognises the importance of reinforcing the existing centres. However, consider the Strategy can be strengthened with the following changes:	Sub 53.1 Support noted.
					D2	53.2		<p>P.9 Strategic Direction (2) Landscapes and Amenity (i) - Recognise and protect outstanding natural landscapes and natural areas and <u>heritage and cultural landscapes</u> in the district from inappropriate activities.</p> <p>P.34 Landscape, Biodiversity and Amenity - ... Appropriate preservation of the natural character of the coastal environment, outstanding natural features and landscapes, historic heritage including cultural and heritage landscapes.</p> <p>P.46 Action no A2.1 - Provide protection for outstanding and amenity landscapes, heritage and cultural landscapes and areas recognised of natural character, including the coastlines, wetlands, lakes and rivers.</p>	Sub 52.2. Accept. Refer Section 10.1.
					D4	53.3		P.36 Add to list in right hand column - 'Promoting seismic strengthen of older building stock.'	Sub 53.3 Agree add amendment. Refer 11.3.5
					D10	53.4		P.39 Add following wording - 'Existing underutilised heritage building stock provides opportunity for intensification of residential activity making use of existing infrastructure, and access to amenities and transportation options. It also provides greater diversity of housing opportunities, diversifies the inner city population and support commercial activities such as restaurants and shops.'	Sub 53.4 Reject. Too specific for a GMS. Refer 11.3.5
						53.5		P.66 Add to Table 14 - Provisions within the Replacement District Plan to encourage and incentivise seismic strengthening of heritage buildings, adaptive re-use of older buildings, and inner city living.	Sub 53.5. Accept in Part. Refer 11.3.5. Amendment Action A1.2 District Character.
				Implementations	District Plan Review	53.6		P.86 G.1.1 District Plan Review new wording - 'Consider ways in which the Replacement District Plan can encourage and incentivise seismic strengthening of heritage buildings, adaptive re-use of heritage buildings, and inner city living.'	Sub 53.6. Reject. Refer 11.3.5. Too specific
54	Milward Finlay Lobb Limited	PO Box 434, Timaru	admin@mflnz.co.nz	Town Growth	Overall	54.1		<p>The submitter suggests that inadequate consideration has been given to the 75% target of all new dwellings being in the urban area.</p> <p>The applicant therefore suggests that a target of 60/40 rural urban distribution is adopted to match historical building consents and job availability statistics.</p>	Sub 54.1. Reject Need to achieve consolidation as set out by the CRPS, a 25:75 split is seen as aspirational but more appropriate in that context. Also achieves other aims in the RPS i.e. use of rural land, infrastructure efficiency. Current building consent history takes into account exemptions approach for rural residential subdivision.
						54.2		<p>Disagree with the Strategy's modest population growth and significant increase in aging population.</p> <p>The submitter seeks council to recognise for a desire to replace employees as they retire and so grow the population. Such recognition should include sufficient additional zoned land both urban and rural residential to cater for the new employees to the District.</p>	54.2 Reject. <p>(a) The NPS2017 growth projections that identify an overall slow-down in growth, but an overall demand for 1,800 new dwellings Property Economics, Attachment A – Table 1.</p> <p>(b) An aging population, and the composition of households to also likely change, with a proportional decrease in ‘family households’ and an increase in ‘one-person households’. Growth Options Assessment. Section 1 – District Growth Assumptions. Figure 1.5: Natalie Jackson, University of Waikato.</p>
					TuGA	54.3		Historically, there has been a disconnection between Industrial land rezoning and the provision of relevant services. Such disconnection has resulted in development frustrations for both potential purchasers and developers.	54.34 Reject. Refer Section 9. Installation of services is in combination with the Infrastructure Strategy and development of zoned Industrial land.
					RRGA	54.4		Disagree with the predicted Rural Residential Growth. The submitter considers inadequate evaluation has been made in this assessment and future demand of such properties has been significantly under-projected.	54.4 Reject. Refer Section 2.2.2.4. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long term demand (to 2048) can also be accommodated for the 5% - 10%

									demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.
55	NA & SI Walker	585 Pleasant Point Highway, Timaru	admin@mflnz.co.nz	Town Growth	TuGA,	55.1		<p>The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.</p> <p>Predicted growth is too conservative.</p>	Sub 55.1. Reject Refer 12.3.1.
					PPGA, NR	55.2		<p>The submitter requested to rezone own property at 585 Pleasant Point Highway, Timaru. The applicant considers the land has the following advantages compared with area 'Level 2' that was considered in the 'Options Report':</p> <ul style="list-style-type: none"> - A smaller total land area which can achieve consolidation. - Reduced number of landowners. - It eliminates a large area of land subject to flood hazard. - The addition of sealed road frontage to Rolling Ridges Road provides for more flexibility in roading network and ease for future subdivision. - The suggested 2.0ha minimum allotment size would reduce the total number of new household to 30 within the area. Such a catchment size is considered to be viable sustainable for private wastewater and stormwater disposal. 	Sub 55.2 Reject. Located in close proximity to Timaru International Motor Racing speedway (600m) and southern end of Runway for Timaru Airport (1.9km). Despite being outside of statutory noise boundaries, would increase density of incompatible uses in this environment. Located some 7km from Timaru. Considerable distance (9.0km) from urban boundary. No ability to distinguish if zoned with other sized allotments.
					RRGA	55.3		<p>The predicted Rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p> <p>The rating for Elloughton has been incorrectly calculated and should only be 115, not 121.</p>	Sub 55.3 Reject. Refer Section 4.5 Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.
56	Levels Golfing Lifestyles Limited, and Timaru Golf Club	87 Lynch Road, Levels	admin@mflnz.co.nz	Town Growth	TeGA, NR	56.1		<p>The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.</p> <p>Predicted growth is too conservative.</p>	Sub 56.1. Reject Refer 12.3.1.
						56.2		<p>The submitter requested 37, 81, 83 & 85 Lynch Road, Levels be rezoned from Rural 1 to Rural Residential for the following reasons:</p> <ul style="list-style-type: none"> - The land is located adjacent to the Timaru Golf Club. - To secure some membership, and assist with volunteers required to help maintain the course and assist in sharing costs of internal roads, and plant replacement. - Rural residential demand was under estimated in the Strategy. 	Sub 56.2 Reject. Located in close proximity to Runway for Timaru Airport (1.4km). Despite being outside of statutory noise boundaries, would increase density of incompatible uses in this environment. Located some 7km from Timaru. Considerable distance (6.0km) from urban boundary at Washdyke. No ability to distinguish if zoned from other similarly sized allotments. Including those immediately adjacent the proposed rezoning.

					RRGA	56.3		<p>The predicted Rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p> <p>The rating for Elloughton has been incorrectly calculated and should only be 115, not 121.</p>	<p>Sub 56.3 Reject. Refer Section 2.2.2.4. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.</p>
57	Harvey Norman Properties (N.Z.) Limited	226 Evans Street, Timaru	daniel.shao@hainesplanning.co.nz	Town Growth	TuGA, NR			<p>Agree with the consolidation approach at existing settlement areas.</p> <p>The submitter requested own land at 226 Evans Street, Timaru is rezoned from Industrial L to Commercial to reflect existing land uses and to be consistent with the resource consent to granted in 2014 to extent commercial activities within the site.</p> <p>The submitter also requested the remaining land at 226 Evans Street, Timaru be rezoned from Residential 1 to Industrial L as this area is south facing and prone to flooding risk, which is not suitable for residential development.</p>	<p>Sub 57.1 Reject. Refer Section 6.3.2.</p>
58	Clarebrook Farms Limited	362 & 376 Claremont Road, Timaru	admin@mfinz.co.nz	Town Growth	TuGA, NR	58.1		<p>The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.</p> <p>Predicted growth is too conservative.</p>	<p>Sub 58.1. Reject Refer 12.3.1.</p>
						58.2		<p>The submitter requested the 102.6341Ha area area of land at 362 & 376 Claremont Road, Timaru be rezoned from Rural 1 to Rural Residential to provide a maximum of 21 allotments with a Council approved Outline Development Plan. The rezoning is requested on the following basis:</p> <ul style="list-style-type: none"> - There is insufficient Rural Residential land is provided in the Strategy. - Capping the maximum number of allotments in the area is an effective method of achieving consolidation and manageable growth. - The size of the proposed allotments are a sustainable way of providing on-site stormwater and effluent disposal. - The land has esplanade strips suitable for public recreation on the banks of the Otipua Stream. - Land is in single ownership and owner is willing to develop the land. - Any potential reverse sensitivity issues with rural and residential activities can be managed by Council approved Outline Development Plan. 	<p>Sub 58.2 Reject. Subject area is located some 3.0km from urban boundary and extent of rezoning (over 100ha) would not promote urban consolidation. Accordingly considered contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development.</p>

					RRGA	58.3		<p>The predicted Rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p> <p>The rating for Elloughton has been incorrectly calculated and should only be 115, not 121.</p>	<p>Sub 58.3 Reject. Refer Section 2.2.2.4. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.</p>
59	Timaru Civic Trust	Flat A, 176A Wai-iti Road, Highfield, Timaru	email@universalform.co.nz	Strategic Directions	D1, D2, D3, D6, D7, D8	59.1		<p>Timaru's heritage buildings should be a key element in the Districts identity. Priority should be given to protecting and enhancing the heritage buildings.</p> <p>Timaru's CBD should be highlighted as a key urban amenity element, which provides a central focus for shopping, entertainment and other civic activity.</p> <p>The CBD should be a key urban amenity element. Timaru's CBD should be a key location for residential intensification as there is existing empty building space, infrastructure and ample amenity.</p> <p>Strategy should deal with greater than expected / forecast growth of transport network capacity.</p>	<p>Sub 59.1 Recognition, but not necessarily primacy is given to the District's heritage buildings. DP will recognise heritage fabric, as well as Heritage Precincts in the Timaru CBD. Not sure what additional material could be usefull added to the GMS.</p>
					D4	59.2		<p>No consideration has been given to the issue of funding for earthquake strengthening and any compensation for the building owners.</p>	<p>Sub 59.2 Too specific</p>
60	BA & TL Ellery	14 Grange Settlement Road, Temuka	andrew@mfinz.co.nz	Town Growth	TeGA	60.1		<p>The submitters support the rezoning of Rural 1 land to Rural Residential at 14 Grange Settlement Road. Their support is based on the proximity of the owners property to the Residential 1 Zone, the availability of Councils piped sewer network and also the existing subdivision on the northern boundary of the site.</p>	<p>60.1 Accept. Need to manage Rural Residential supply to not undermine consolidation approach. Refer Section 2.1.4 Rural Residential – the approach</p> <p>However, services may not necessarily be provided to service any additional allotments.</p>
					RRGA	60.2		<p>The submitter proposed a 0.2ha minimum allotment size (and a maximum of 0.5ha) to enable transition between the Residential 1 Zone and the 'Thompson' Rural Residential Zone.</p>	<p>60.2 Reject A 2,000m2 minimum is considered to be too urban in terms of character and amenity, a 05 to 2ha allotment size is recommended. Refer Section 2.3.3.3</p>
61	GW & DS Craig & MWS Clark, KW & SM Pyke, GA	Pages Road, and Kellands Hill Road	admin@mfinz.co.nz	Town Growth	TuGA, NR	61.1		<p>The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.</p>	<p>Sub 61.1. Reject Refer 12.3.1.</p>

	& SA Morton & Woolcombe Trustees 2 Limited, GA & SA Morton, JR & JJ Ford, and PG & JA Wilkins & GJA Proudfoot					61.2	<p>The Submitters seek the adoption of the "Kelland Heights" Rural Residential growth option.</p> <p>The submitters also requested their own properties at Pages Road, Timaru be rezoned Rural Residential 'extended Kellands Hill' for allotments between 0.5ha - 2ha for the following reasons:</p> <ul style="list-style-type: none"> - The predicted rural residential growth in Timaru artificially low and more land is needed for rural residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Ashburton District significantly enables more Rural Residential development on the fringe of Ashburton than Timaru District even though it is 30% smaller in population. - The ease of servicing the land. It would be preferable for a Council initiated and maintained low pressure pumped sewer main to service this area (and beyond). - The land is close to existing settlement area. 	<p>61.2 Reject. Subject area is located some 1.5km from urban boundary and extent of rezoning (over 53ha) would not promote urban consolidation. Accordingly considered contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development. Infrastructure issues identified in terms of efficiently providing for roading network.</p>
					RRGA	61.3	<p>The predicted rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p>	<p>61.3 Reject. Refer Section 2.2.2.4. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.</p>
62	DA & RM Coupland & MHS Trust Management Limited, MLS & RE Talbot, CI & DI Mackenzie, and EH & KP Andrews & EO Sullivan	385, 397, 403 & 469 Pages Road, Timaru	admin@mfinz.co.nz	Town Growth	TuGA	62.1	<p>The submitters supported their own properties at 385, 397, 403 and 469 Pages Road, Timaru be rezoned to Rural Residential 'Kelland Heights' option.</p>	<p>Sub 62.1. Acknowledged.</p>
						62.2	<p>The submitters considered the suggested allotment sizes without a connection to a Council reticulated sewer network of between 0.5 and 2ha to be practical. Preference is for Council to initiate and maintain a low pressure pumped sewer main to service this area (and beyond).</p>	<p>Sub 62.2. Reject. Refer 9.3.4</p>
					RRGA	62.3	<p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p>	<p>62.3 Reject. Refer Section 2.2.2.4. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.</p>
63	ZJ Poplawski, CM & JL Morris, JM & NE Savage, ZJ	Gleniti Road, Gladstone Road and Oakwood Road	admin@mfi.nz.co.nz	Town Growth	TuGA, NR	63.1	<p>The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.</p>	<p>Sub 63.1. Reject Refer 12.3.1.</p>

	Poplawski & HC Trustees 2009 Limited, J & B Family Trust, DC & CE Brand & HC Trustees 2010 Limited, DK & MK Coupland & TM Simpson, and DA & RM Coupland & TM Simpson					63.2		<p>The submitters requested land adopt the 'Hadlow' Rural Residential Growth option accommodating allotments between 0.5ha - 2ha for the following reasons:</p> <ul style="list-style-type: none"> - The predicted rural residential growth in Timaru artificially low and more land is needed for rural residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Ashburton District significantly enables more Rural Residential development on the fringe of Ashburton than Timaru District even though it is 30% smaller in population. - The ease of servicing the land. It would be preferable for a Council initiated and maintained low pressure pumped sewer main to service this area (and beyond). - The land is close to existing settlement area. - The properties are unique within the district with their proximity to Gleniti Golf Course and spectacular northerly views. 	63.2 Reject. Subject area is located some 1.0km from urban boundary and extent of rezoning (over 50ha) would not promote urban consolidation. Accordingly considered contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development.
					RRGA	63.3		<p>The predicted rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p>	63.3 Reject. Refer Section 2.2.2.4. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.
64	AJ & CA Brosnahan, AR & FE Gale, AS Rabbidge & HR Singline & RSM Trust Limited, EA Pyke, FH Tong, BJ & HJ Walton and AN & DB Rountree	210, 222 & 230 Gleniti Road, and 5, 17 & 18 Snowdon Road, Timaru	admin@mfinz.co.nz	Town Growth	TuGA, NR	64.1		<p>The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.</p>	Sub 64.1. Reject Refer 12.3.1.
						64.2		<p>The submitter requested properties be rezoned in accordance with the Rural Residential 'Gleniti North' Growth option, with a deferred Residential overlay being the 'Gleniti Road' Residential Growth option, with a deferred zoning commencement date of 1 January 2019 (i.e. immediately after the short-term 2013-2018 projection) for the following reasons:</p> <ul style="list-style-type: none"> - The predicted residential growth in Timaru artificially high and less land is needed for residential. - The predicted rural residential growth in Timaru artificially low and more land is needed for rural residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Districts beyond South Canterbury offering extensive options for greenfield residential and rural residential development. - The ease of servicing the land. - The land is close to existing settlement area. - The properties are unique within the district with their proximity to Gleniti Golf Course and spectacular northerly views. 	Sub 64.2. Reject: Refer 7.3.1.

					RRGA	64.3		<p>The predicted residential and rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural.</p>	Sub 64.3. Reject. Refer Section 3.
65	Riverside Estate (2008) Limited, DE Ngaha & JM Hammond	9 Grant Street and Lot 2 DP 387529 on Grant Street, Temuka	admin@mflnz.co.nz	Town Growth	TeGA, NR	65.1		<p>The submitter requested own property at 9 Grant Street, Temuka be rezoned Residential for the following reasons:</p> <ul style="list-style-type: none"> - The predicted residential growth in Temuka artificially low and more land is needed for residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. - The land is already zoned Deferred Residential 1. It is critical for the growth of Temuka that this Temuka west area is developed to its full potential within the 30 year period of the Strategy. - The residential zoning should have capital contributions for roading and associated essential services, removing the reliance on the downstream property developing first. Council will need to provide necessary public sewer connection that could be recovered by capital contributions. 	Sub 65.1 Reject. Refer 12.3.1. Also part of the Res 1 (North West Temuka) Deferred Zone, Infrastructure basis for deferral still present, refer Section 12.3.3.
					TeGA	65.2		<p>The predicted residential growth in Temuka is incorrect and artificially low. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Council should be applying the pre March 2017 figures for predicted household units required for Temuka by 2043.</p>	Sub 65.2 Reject. Would be inappropriate and without foundation for the Council to utilise two distinct population projections for adjoining settlements. Also, the NZ Stats medium projections are seen as the appropriate base, given NPS-UDC [and universal acceptance at Environment Court]. Refer Section 1.3.5
66	A McCleary, and G & M Ladbrook	Corner Meadows Road and Aorangi Road, Washdyke	fred@do.co.nz	Town Growth	TuGA, NR	66.1		<p>The submitter requested own land located on the corner of Meadows Road and Aorangi Road, Washdyke (approximately 4.1ha, Lot 1 and 2 DP432561) be rezoned Deferred Industrial for the following reasons:</p> <ul style="list-style-type: none"> - To provide for future commercial / industrial growth and development in the region. Timaru is currently experiencing significant growth with regard to port activities, food production / processing activities, road transport activities and construction activities. The Timaru Economic Development Strategy 2015 seeks creation of 300 jobs per year (6000 by 2035) primarily in the aforementioned industries, which will require a significant area of suitable zoning for these primarily industrial activities. Draft GMS seems at odds with the growth estimates. - Existing provision of 103ha of Industrial land (both 70ha vacant and 33ha deferred) is considered insufficient to maintain land supply for growth of the region. - Current concentrated ownership of existing Industrial land within Washdyke is having an anti-competitive effect on development within the area. Introduction of new Industrial land within the area would dilute ownership to allow for increased competition within what is a limited market. - Land is question allows for natural expansion of the Washdyke Industrial Area. Area is serviced by existing roads, 500 metres from the Council water mains, and near the Council main trunk sewer. It is also in a low residential area, with rural amenity already effected by existing prevalent industrial activity and the TDC wastewater facility. <p>The above requested approach is a practical response to providing contingency for future growth and agility with managed infrastructure cost sharing without requiring the onerous, costly and time consuming exercise of either a private or Council led plan change to address shortages in</p>	Sub 66.1 Reject. Refer Section 5.4 and Attachment E:2. Note this area is separated from existing Washdyke Industrial Area by the undeveloped Expansion Area.

								industrial land in the future. It will also provide certainty to commercial interests seeking to establish activities within the zone.	
					TuGA	66.2		The predicted industrial growth in Timaru is incorrect and artificially low.	Sub 66.2 Reject. Predicted Growth rates are appropriately based on Medium NZ Statistics Projections, acknowledging increase in base projections (2013 update). Refer Section 5.5. For the Timaru District, as outlined by Property Economics (Attachment A) there is more than sufficient zoned Industrial land, at the macro district level to meet the 10 year (medium term) and 30 year (long term) demand. At a District level, the Industrial market is not constrained.
67	LP & JA Moodie	236 Meadows Road, Washdyke	fred@do.co.nz	Town Growth	TuGA, NR	67.1		<p>The submitter requested own land located at 236 Meadows Road, Washdyke (25.75ha, Lot 3 DP432561) be rezoned Deferred Industrial for the following reasons:</p> <ul style="list-style-type: none"> - To provide for future commercial / industrial growth and development in the region. Timaru is currently experiencing significant growth with regard to port activities, food production / processing activities, road transport activities and construction activities. The Timaru Economic Development Strategy 2015 seeks creation of 300 jobs per year (6000 by 2035) primarily in the aforementioned industries, which will require a significant area of suitable zoning for these primarily industrial activities. Draft GMS seems at odds with the growth estimates. - Existing provision of 103ha of Industrial land (both 70ha vacant and 33ha deferred) is considered insufficient to maintain land supply for growth of the region. - Current concentrated ownership of existing Industrial land within Washdyke is having an anti-competitive effect on development within the area. Introduction of new Industrial land within the area would dilute ownership to allow for increased competition within what is a limited market. - Land in question allows for natural expansion of the Washdyke Industrial Area. Area is serviced by existing roads, 700 metres from the Council water mains, and near the Council main trunk sewer. It is also in a low residential area, with rural amenity already effected by existing prevalent industrial activity and the TDC wastewater facility. 	Sub 67.1 Reject. Refer Section 5.4 and Attachment E:2. Note this area is separated from existing Washdyke Industrial Area by the undeveloped Expansion Area.
					TuGA	67.2		The predicted industrial growth in Timaru is incorrect and artificially low.	Sub 67.2 Reject. Predicted Growth rates are appropriately based on Medium NZ Statistics Projections, acknowledging increase in base projections. Industrial Refer Section 5.5. For the Timaru District, as outlined by Property Economics (Attachment A) there is more than sufficient zoned Industrial land, at the macro district level to meet the 10 year (medium term) and 30 year (long term) demand. At a District level, the Industrial market is not constrained.
68	KD & MJ Cahill	50 Falvey Road, Timaru	admin@mfinz.co.nz	Town Growth	TuGA, NR	68.1		<p>The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.</p> <p>Predicted growth is too conservative.</p>	Sub 68.1 Refer Section 3

						68.2		<p>The submitter requested own property at 50 Falvey Road, Timaru be rezoned Rural Residential for allotments between 0.5ha and 2ha for the following reasons:</p> <ul style="list-style-type: none"> - The predicted Rural Residential growth in Timaru is artificially low and more land is needed for rural residential. Ashburton District significantly enables more Rural Residential development on the fringe of Ashburton than Timaru District even though it is 30% smaller in population. - The area is already peri-urban in character. - The land is close to existing settlement area. - The land does not contain versatile soils. - The ease of servicing the land. - The ease of accessing the land from sealed roads. 	
					RRGA	68.3		<p>The predicted Rural Residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand will come from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p> <p>The rating for Elloughton has been incorrectly calculated and should only be 115, not 121.</p>	
69	P & J McLachlan	417 Timaru - Temuka Highway, RD3, Timaru	jandpseadown@xtra.co.nz; glen@do.co.nz	Town Growth	TuGA, NR	69.1		<p>Request the rezone of 417 Timaru - Temuka Highway from Rural 1 to Rural Residential for allotments between 0.5ha and 2ha for the following reasons:</p> <ul style="list-style-type: none"> - The land's proximity to town and amenity facilities - The land is surrounded with small rural blocks from 0.7ha to 6ha and will not give raise to adverse effects. - Given the existing fragmentation, the land cannot be changed to productive land. - Soil in this area are free draining providing suitable options for on-site effluent disposal and stormwater discharge. - The site is not known to any natural hazards. 	<p>Sub 69.1 Reject. Located in close proximity to Runway for Timaru Airport (1.4km). Despite being outside of statutory noise boundaries, would increase density of incompatible uses in this environment. Located some 7km from Timaru. Considerable distance (6.0km) from urban boundary at Washdyke. No ability to distinguish if zoned from other similarly sized allotments. Including those immediately adjacent the proposed rezoning.</p>
70	Davis Ogilvie (Aoraki)	PO Box 359, Timaru	glen@do.co.nz	Town Growth	Overall	70.1		<p>The approach is conservative. Timaru is currently experiencing significant growth with regard to industrial and commercial activities. The proposed Industrial, Residential and Rural Residential land is considered insufficient to meet demand. Suggests Council to include more deferred zones to provide more options should growth is under estimated.</p>	<p>Sub 70.1:</p> <p>Industrial and Commercial: Reject. Refer Section 5.5. For the Timaru District, as outlined by Property Economics (Attachment A) there is more than sufficient zoned Industrial land, at the macro district level to meet the 10 year (medium term) and 30 year (long term) demand. At a District level, the Industrial market is not constrained.</p> <p>Rural Residential: Reject. Refer Section 2.2.2.4. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.</p>

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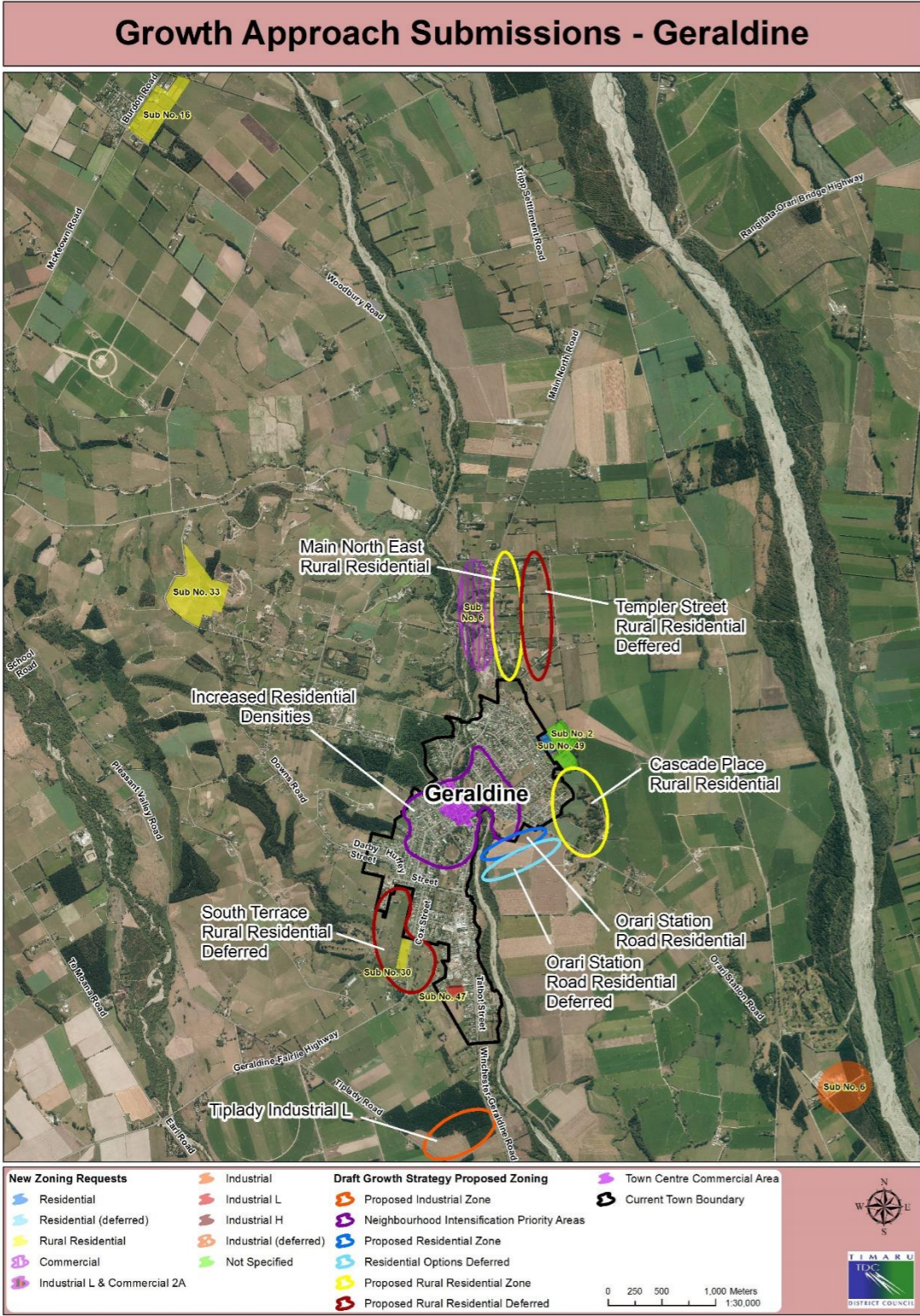
				Strategic Directions	D12	70.4		<p>The submitter feels that some important stakeholders and affected landowners haven't been adequately consulted with in the preparation of the Strategy, such as (not limited to):</p> <ul style="list-style-type: none"> - Surveying / planning consultants / property experts in our region. - Significant business operators (e.g. Port of Tauranga, Fonterra). - Transport / logistic companies. - Local real estate agents & valuers. - Hunder Downs Irrigation. - Building companies / master builders. - Property law society. - Immigration New Zealand. <p>Due to resource and time restrictions, public and stakeholders may not be able to respond during the notification period. Council need to be more proactive to get the public and stakeholder's involvement in the process.</p>	Sub 70.4. Reject. Refer 11.3.4.
71	South Canterbury Branch, New Zealand Institute of Surveyors	PO Box 434, Timaru	jason@mfinz.co.nz	Town Growth	Overall, NR	71.1		<p>Predicted growth is too conservative and more Residential and Rural-Residential land or deferred Residential and Rural-Residential land need to be provided because:</p> <ul style="list-style-type: none"> - Timaru is a town that supports a large rural population. Restrictions on rural subdivision will limit provisions for farmer's succession plan. Allowances need to be provided for boundary adjustments, non-builltable allotments and lifestyle blocks to avoid retired farmers leaving the District. - The impact of lifestyle blocks is not as significant as it once was with advancement of servicing and relevant planning provisions. - Over planning for population growth will have much less of a negative impact than under planning resulting in restriction. - Planning / deferred zoning now will save time and money in future. - Insufficient land supply may result in increased competition, compounding in inflated land values. - Not 100% of the land proposed to be re-zoned for future growth will be developable. - The desirable characteristics of Timaru is the open space / semi-rural feel. - No consideration of commercial land in western Timaru. - Increasing tourism and associated increase on the service sector could lead to a growing population. <p>Deferred zoning should be considered as a mean of controlling the progressive development.</p> <p>Council need to account for work being undertaken by public and private groups to promote and encourage industrial, commercial and economic investment in the region, recognising its associated social growth possibilities.</p>	Sub 71.1. Reject Refer Section 3 and Section 4
72	K Wilson		kirsetn@outlandish.co.nz		Rural Residential	72.1		<p>Rural Residential development is really inefficient and a waste of productive land. Council should promote consolidation to reduce demand for Rural lifestyle properties.</p>	Sub 72.1 Reject. Approach seeks to recognise that there is a valid lifestyle demand for rural residential living and provide for it in a more sustainable manner, including encouraging intensification. 72.2 It is difficult to future

					Community	72.2		Does the strategy take into account the ethnicities of the future population. This young generation of multicultural mix will make up more than 50% of our total population in 30 years time. It will be different looking community, who will be more open to living centrally.	proof for all types of ethnicities and demands, the GMS seeks to recognise that there will be different approach to housing, employment and lifestyle and promote opportunities for these to be realised.
73	B Speirs		lsgl@xtra.co.nz		Residential	73.1		Simply rezoning for residential intensification does not mean that it will occur. Examples including NW Temuka and Oceanview Timaru have shown land use contrasting with the zoning purpose.	Sub 73.1 Zoning only provides an opportunity for development to occur. However, it provides certainty to Council in terms of infrastructure spend and the market as to where development is directed.
					Residential	73.2		The Growth Strategy indicates that there is sufficient land zoned for residential use, this is unlikely the case. The only way the district plan can influence the price of residential land is to have a large surplus of land zoned for residential use.	Sub 73.2 Simply rezoning additional residential opportunities does not, on its own, reduce house prices (other variables include construction costs, income and contributions for infrastructure). An oversupply of housing can reduce certainty in terms of community investment in infrastructure and property development.
					Rural Residential	73.3		The current dispersed rural living gives better community and social results, make better use of roading, power and telecom services, and provides more rural users with better services than economically be provided with lower residential densities.	73.3 Reject. Need to manage Rural Residential supply to not undermine consolidation approach. Refer Section 2.1.4 Rural Residential – the approach
					Residential (Greenfield)	73.4		Greenfields development should be encouraged on the lower portions of catchments on the periphery of settlement areas, where connections for infrastructure do not require the replacement or upgrading of existing infrastructure, and where the costs of infrastructure can be placed on the developer.	Sub 73.4 The strategy has considered Greenfields options under the Options assessment, including criteria suggested, apart from Geraldine it is considered that sufficient surplus exists to cater to demand.
					Commercial	73.5		Strategy ignores the fact that alternative commercial areas have grown because the Timaru CBD does not have land for Large Format Retail (Supermarket, Warehouse, Harvey Norman) at a reasonable cost.	73.5 Reject. Refer Section 5.3. There is considerable surplus retail land to 2028, longer term and large format capacity is present in the existing zoned, but undeveloped, showgrounds site.
74	Sally Hilton	22 Ameer Street, Pleasant Point			Rural Residential (Pleasant Point)	74.1		Rezone Lot 1 DP 5504 from Rural 1 to Rural Residential. The property is less than 8ha is size, was once part of the school (to the south) and used as their agricultural block. It is unproductive as the 1986 floods eradicated the top soil and left the land with very little agricultural value. It is close to the town and school. Consideration could also be given to just making the road corridor available for building, whilst leaving the balance rural.	Sub 74.1. Reject. Refer Section 7.3.1

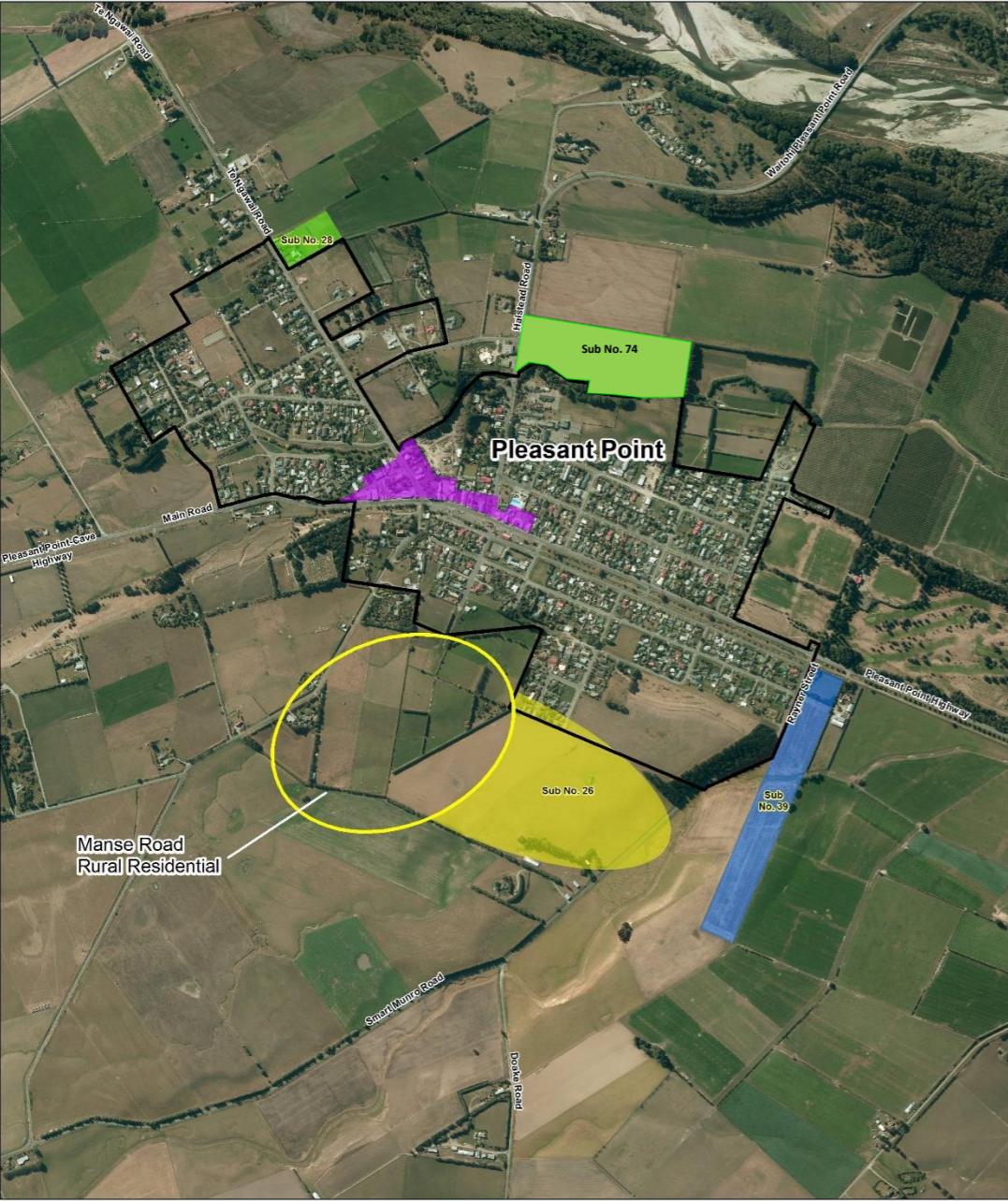
75	Te Runanga o Arowhenua	C/- Aoraki Environmental Consulting Limited	kylie.hall@avanzar.co.nz	Iwi		75.1		B:1 Ngai Tahu and Te Runanga o Arowhenua: Insert reference to 'Iwi Management Plan of Kati Huirapa for the Area Rakaia to Waitaki (1992)'.	Sub 75.1 Accept in part. I have reviewed the 'Iwi Management Plan of Kati Huirapa for the Area Rakaia to Waitaki (1992). Whilst dated it accounts for specific expression of kaitiakitanga and rangatiratanga for Te Rūnanga o Arowhenua and should be referenced. The <i>Mahaanui Iwi Management Plan</i> does not extend as far south as Timaru District. <u>The more specific 'Iwi Management Plan of Kati Huirapa for the Area Rakaia to Waitaki (1992) as prepared by Te Rūnanga o Arowhenua is dated. Both contain</u> However, there are a number of principles of relevance with the Management Plan that the Timaru District Council should consider under both the Local Government Act (2002) and the Resource Management Act (1991) in terms of both this Growth Management Strategy and also in terms of District Plan review processes.
						75.2		D:1 Strategic Direction 'Amend to read: <i>Work with Te Runanga o Ngai Tahu and the appropriate papatipu runanga, <u>that being Te Runanga o Arowhenua who holds manawhenua in this takiwa</u></i> to determine areas where....'	75.2 Accept. Provides a more explicit reference.
						75.3		Strategic Direction [2] Actions and Responsibilities. Amend A2.1 and A2.4 to include ' <u>and Te Runanga o Arowhenua.</u> '	75.3 Accept. These matters are referenced in the Mahaanui Iwi Management and Iwi Management Plan of Kati Huirapa for the Area Rakaia to Waitaki (1992). Insert at A2.1and A2.4 Support Agency: <u>Te Rūnanga o Arowhenua</u>

Attachment C – Amendments to DGMS Recommended through submissions or updates

Attachment D – Rezoning Requests: Mapping



Growth Approach Submissions - Pleasant Point



New Zoning Requests

- Residential
- Residential (deferred)
- Rural Residential
- Commercial
- Industrial L & Commercial 2A

Draft Growth Strategy Proposed Zoning

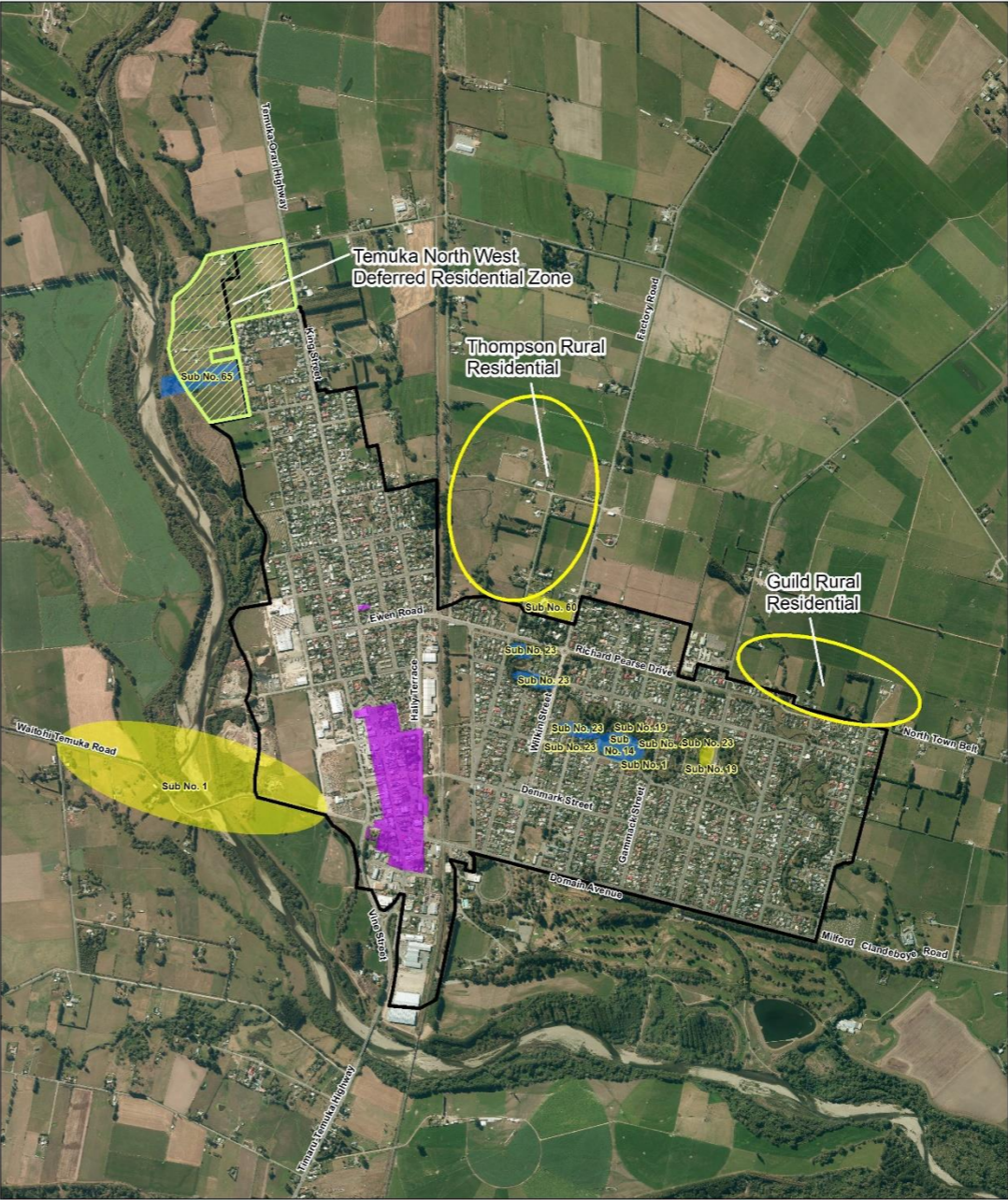
- Industrial
- Industrial L
- Industrial H
- Industrial (deferred)
- Not Specified
- Proposed Industrial Zone
- Neighbourhood Intensification Priority Areas
- Proposed Residential Zone
- Residential Options Deferred
- Proposed Rural Residential Zone
- Proposed Rural Residential Deferred

Town Centre Commercial Area

- Town Centre Commercial Area
- Current Town Boundary

0 100 200 400 Meters
1:10,000

Growth Approach Submissions - Temuka



New Zoning Requests

- Residential
- Residential (deferred)
- Rural Residential
- Commercial
- Industrial L & Commercial 2A

Draft Growth Strategy Proposed Zoning

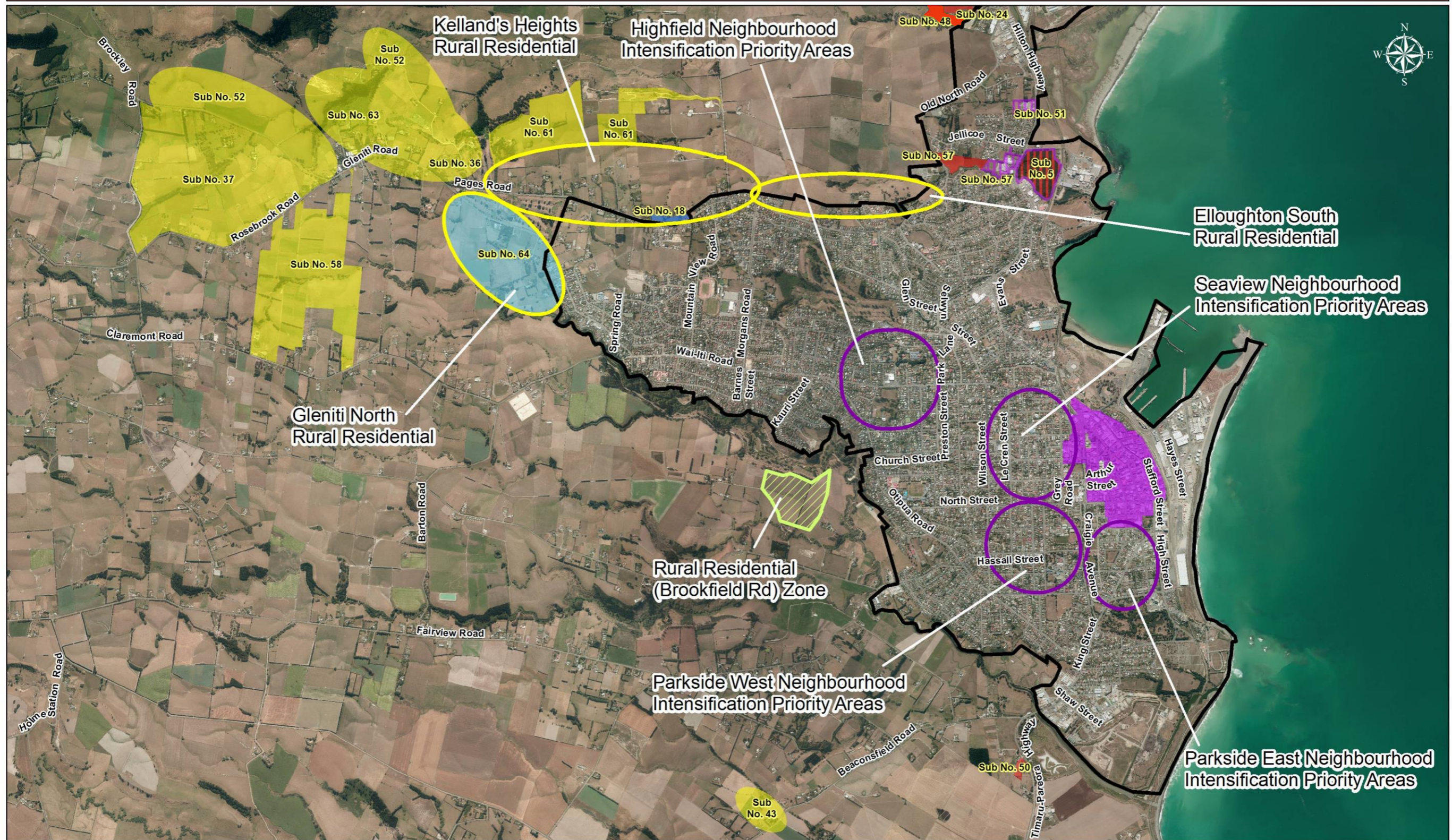
- Industrial
- Industrial L
- Industrial H
- Industrial (deferred)
- Not Specified
- Proposed Industrial Zone
- Neighbourhood Intensification Priority Areas
- Proposed Residential Zone
- Residential Options Deferred
- Proposed Rural Residential Zone
- Proposed Rural Residential Deferred















Temuka North West Deferred Res Zone

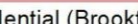
- Temuka North West Deferred Res Zone
- Town Centre Commercial Area
- Current Town Boundary

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Growth Approach Submissions - Timaru

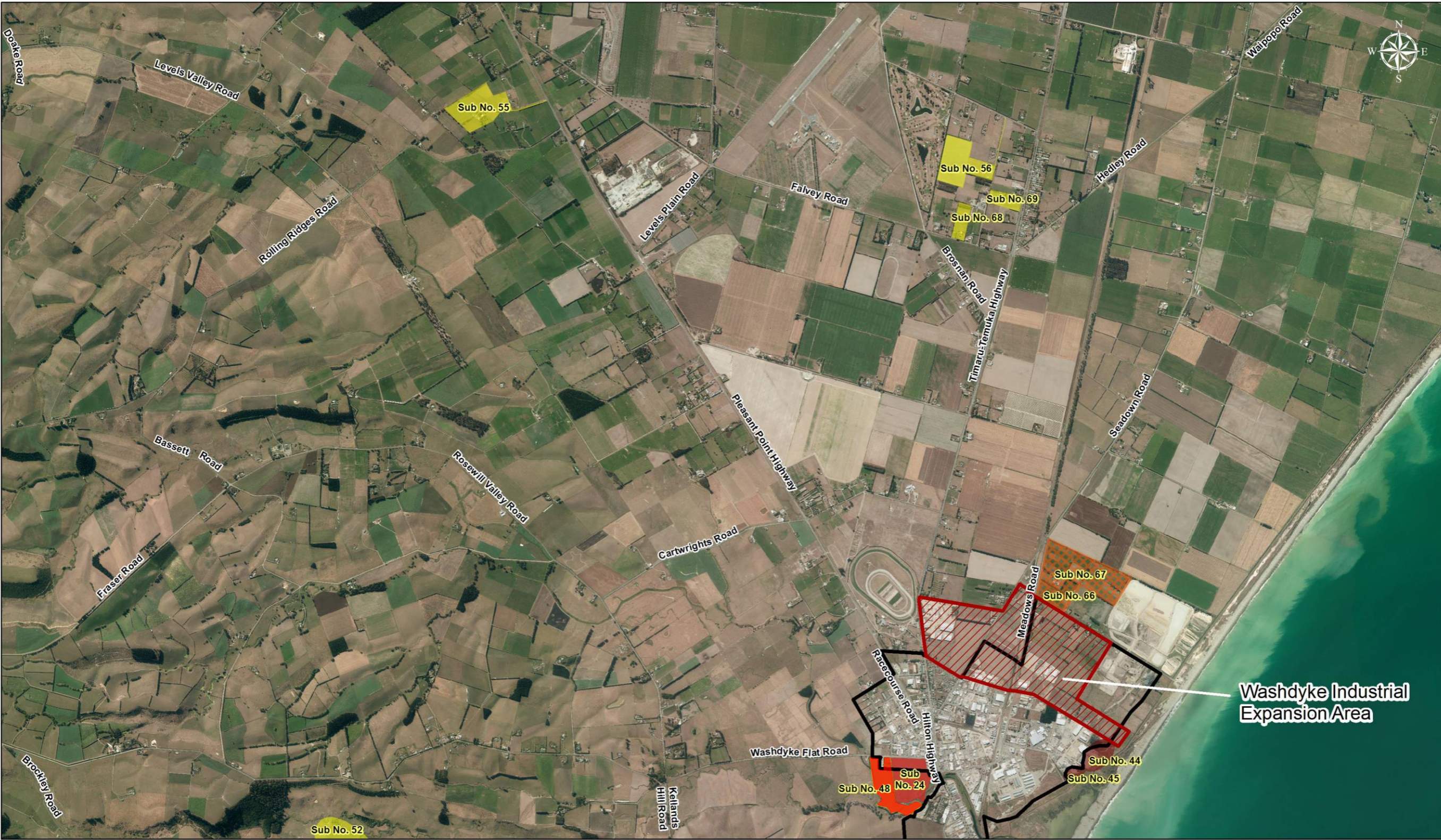


New Zoning Requests		Draft Growth Strategy Proposed Zoning		Residential Options Deferred		Rural Residential (Brookfield Rd) Zone	
	Commercial		Industrial H		Proposed Industrial Zone		Proposed Rural Residential Zone
	Industrial L & Commercial 2A		Industrial (deferred)		Neighbourhood Intensification Priority Areas		Proposed Rural Residential Deferred
	Industrial		Not Specified		Proposed Residential Zone		Town Centre Commercial Area
	Industrial L						Current Town Boundary



0 250 500 1,000 Meters
1:32,500

Growth Approach Submissions - Washdyke



New Zoning Requests

- Residential
- Residential (deferred)
- Rural Residential

Draft Growth Strategy Proposed Zoning

- Proposed Industrial Zone
- Neighbourhood Intensification Priority Areas
- Proposed Residential Zone

Residential Options Deferred

- Proposed Rural Residential Zone
- Proposed Rural Residential Deferred

Rural Residential (Brookfield Rd) Zone

- Washdyke Industrial Expansion Area
- Town Centre Commercial Area
- Current Town Boundary




	Commercial		Industrial H
	Industrial L & Commercial 2A		Industrial (deferred)
	Industrial		Not Specified
	Industrial L		

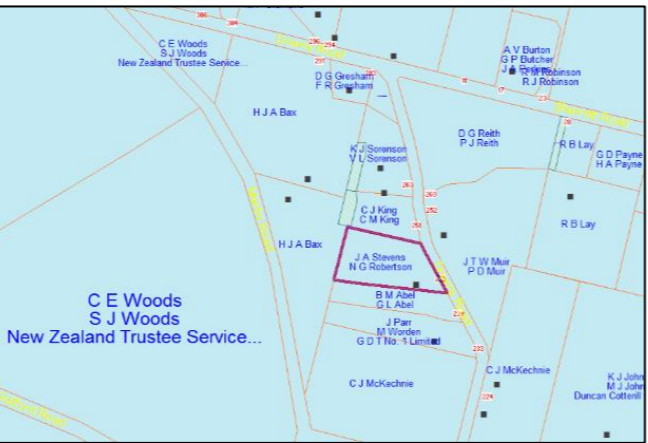
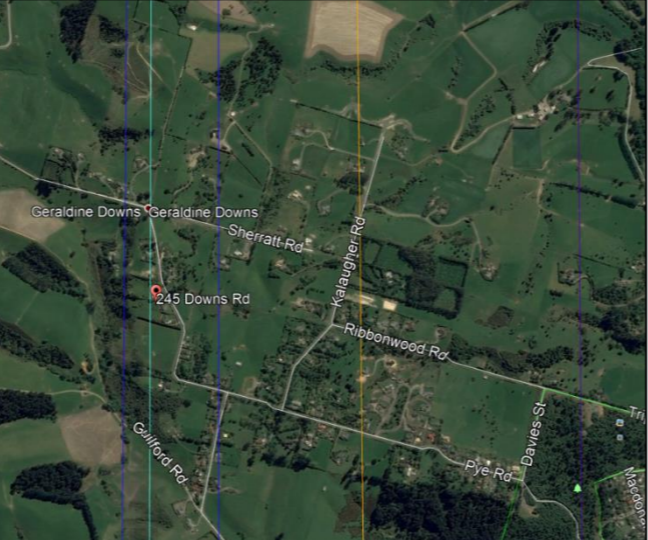
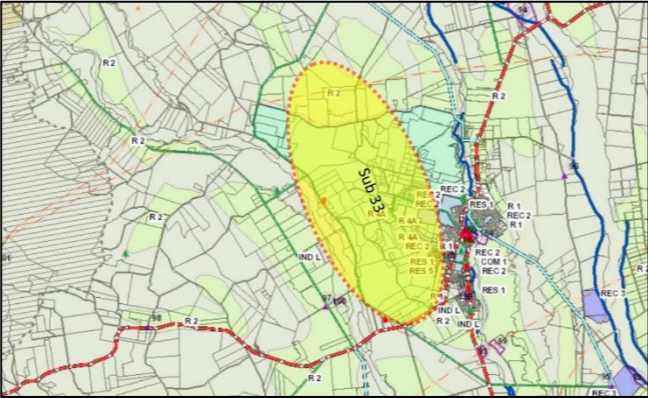
0 250 500 1,000 Meters

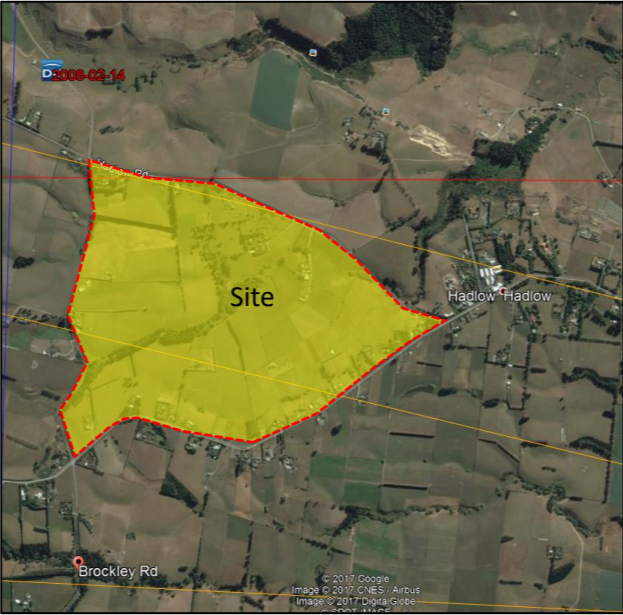


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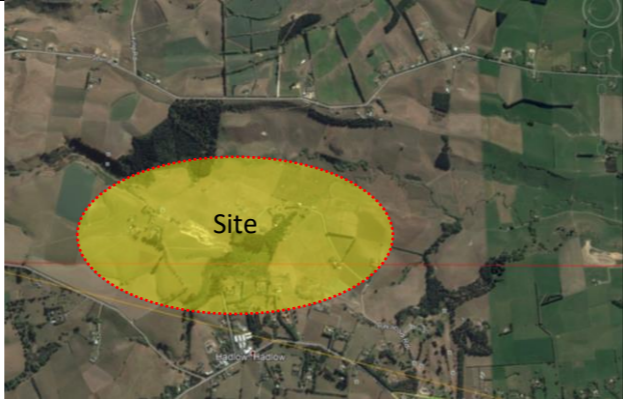
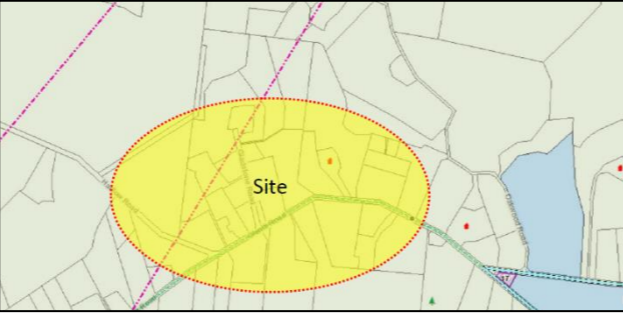


Attachment E:1 – Rural Residential Rezoning Requests





Attachment E:1 Rural Residential Zoning Requests – Detached from Urban Boundaries

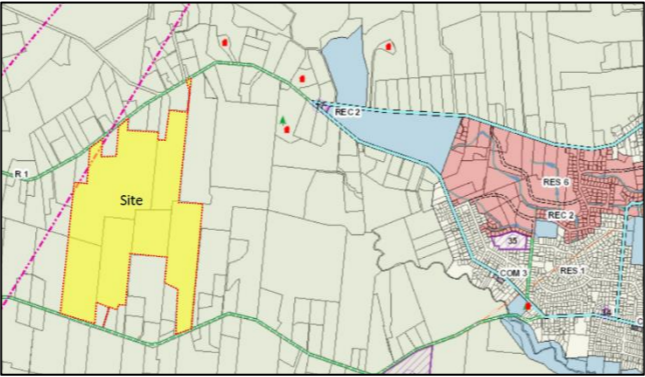


Sub No.	Name	Actual Address	Additional Rezoning Request Location	Requested New Zone	Photos	Additional Detail
1	S Wolczuk		Waitohi Road, Temuka	Rural Residential	  	<p>At a macro level rural residential would not be a linear peninsula as affixed to the existing urban boundary. Hence not consistent with consolidation.</p> <p>At a micro level site was not considered for Rural Residential (pg 19 of Options Assessment), but was considered and rejected in the Industrial assessment (Waithi / Epworth, pg 50) for scoring poorly in terms of flooding and consolidation. The productive potential of the area was also noted.</p> <p>Noticeable drop in elevation from Timaru-Timuka Highway east to Manse Bridge. That area has timber firewood/storage industry on northern extent. No obvious elevated building footprint sites, and stopbanks adjoin river corridor. Area to west of Manse Bridge predominantly rural character.</p> <p>The site is subject to levels of inundation Orari Waihi Flood Plain 100 Year Return Period Flood Map, with likely depths of 0.5 – 1.0+.</p> <p>CRPS Objective 11.2.1 and 11.3.1, 11.3.2 Seeks to 'avoid' new subdivision, use and development that increases risks associated with Natural Hazards. Approach would also be contrary to Strategic Direction [4] Building resilient communities which seeks to avoid development in high hazard areas where risk from natural hazards is assessed as unacceptable.</p> <p>Rezoning would be inconsistent with CRPS Objective 5.2.1 and Policy 5.3.1 in terms of consolidation and attachment to urban boundary.</p> <p>Conclusion: Approach is contrary to CRPS Objective 11.2.1 and 11.3.1. Less appropriate than Thomson and Guild Rural Residential. Rezoning to residential would not give effect to the RPS.</p> <p>Recommendation: Reject rezoning.</p>

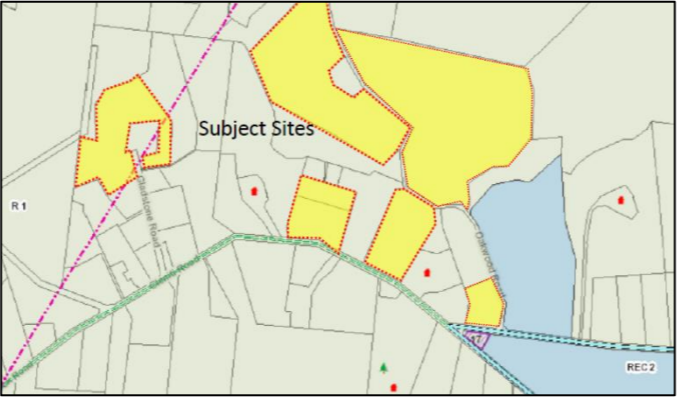
33	N Robertson	245 Downs Road, RD 21, Geraldine	245 Downs Road (Pt RS 25451 BLK / Geraldine), RD 21, Geraldine	Rural Residential	<div></div>	<p>Submitter seeks that 22ha land at 245 Downs Road, Geraldine be rezoned for rural residential development to provide for four separate lifestyle blocks of 5.5ha. Note property search identifies only a 1.1ha property (refer map).</p> <p>Site zoned as Rural 4A. That approach went through an appropriate plan change process which includes the provision of greater density controls and landscaping requirements than sought in orthodox rural residential areas. Minimum density is 0.5ha Rural Residential Sub-zone, 10ha Rural Lifestyle and 40ha Rural Production.</p> <p>At macro level site is not located proximate to existing Geraldine township. At micro level detailed provisions existing within the Rural 4A zone to provide and protect residential rural amenity and character in this area.</p> <p>Conclusion: Approach is less appropriate with CRPS Objective 5.3.1 and consolidation approach. Would create expectation with other similar sites within Geraldine Downs Rural 4A zone.</p> <p>Recommendation: Reject rezoning and retain current Rural 4A provisions</p>
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37	S Smith, Booker, Irvine, Watson, Moir and Leonard	Land bounded by Rosebrook Road, Hadlow Road and Brockley Road	Land bounded by Rosebrook Road, Hadlow Road and Brockley Road	Rural Residential		<p>Site zoned as Rural 1, and contains numerous sites of 2ha predominantly along the ridgeline (which is consistent with a number of areas surrounding Timaru settlement), although some larger sites of 10 – 15ha are present. Area provides a modified rural character and amenity, Area is located some 3.5km from urban boundary. Accordingly considered contrary to CRPS Objective 5.2.1 and RPS Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development.</p> <p>Conclusion: Approach is contrary with CRPS Objective 5.2.1 and Policy 5.3.1 and consolidation approach. Would create expectation with other similar sites surrounding Timaru.</p> <p>Recommendation: Reject rezoning and retain current Rural 1 provisions</p>
43	GA & JL Ward and Footes Trustees Ltd	264 Beaconsfield Road, Timaru	264 Beaconsfield Road, Timaru (Lot 1 DP 64009)	Rural Residential	 	<p>Site zoned as Rural 1, and contains numerous sites of 2ha, although some larger sites of 10 – 15ha are present. Area provides a modified rural character and amenity, Area is located some 3.8km from urban boundary. Accordingly considered contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development.</p> <p>Conclusion: Approach is contrary with CRPS 5.2.1 and 5.3.1 and consolidation approach. Would create expectation with other similar sites surrounding Timaru.</p> <p>Recommendation: Reject rezoning and retain current Rural 1 provisions</p>

52	B Pipe	383 Gleniti Road, RD 4, Timaru	Hadlow and Oakwood Road, Timaru	Rural Residential	 	<p>Site zoned as Rural 1, some smaller sites, but predominantly larger and retaining rural character although some larger sites of 6-40ha are present. Area provides a modified rural character and amenity, Area (Hadlow Corner) is located some 4.5km from urban boundary. On eastern side of Golf Course which provides some demarcation of Kellands Heights Rural Residential Boundary. Accordingly considered contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development.</p> <p>Conclusion: Approach is contrary with CRPS 5.2.1 and 5.3.1 and consolidation approach. Would create expectation with other similar sites surrounding Timaru.</p> <p>Recommendation: Reject rezoning and retain current Rural 1 provisions</p>
55	NA & SI Walker	585 Pleasant Point Highway, Timaru	585 Pleasant Point Highway (Lot 4 DP 72917 & Lot 1 DP 405818), Timaru	Rural Residential	 	<p>Located in close proximity to Timaru International Motor Racing speedway (600m) and southern end of Runway for Timaru Airport (1.9km). Despite being outside of statutory noise boundaries, would increase density of incompatible uses in this environment. Located some 7km from Timaru. Rear site with limited frontage.</p> <p>At a macro level inconsistent with CRPS Policy 5.3.9 which seeks to avoid development which may constrain the ability of Regional Significant Infrastructure to be used (acknowledging outside of noise boundary). Explanation of 5.3.9 states:</p> <p>When developing, modifying, maintaining and operating regionally significant infrastructure, it is not always practicable, or feasible to internalise all adverse effects on the environment. This often influences the quality and character of the environment surrounding such activities. Consequently, care is needed in terms of avoiding, or managing development that if located within the receiving environment of such facilities may affect their efficient and effective operation and development.</p> <p>Development may result in activities which are incompatible with the efficient use and development of regionally significant infrastructure. These may be incompatible because they:</p> <ol style="list-style-type: none"> 1. require a quality, character or type of environment which cannot be reasonably achieved in close proximity to such activities 2. create features which adversely affect the operation and safety of such activities. <p>Approach would also be contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development.</p> <p>Conclusion: Approach is contrary with CRPS Objective 5.2.1 and Policy 5.3.1 and consolidation and coordinated development approach. Would create expectation with other similar sites surrounding Timaru.</p> <p>Recommendation: Reject rezoning and retain current Rural 1 provisions.</p>

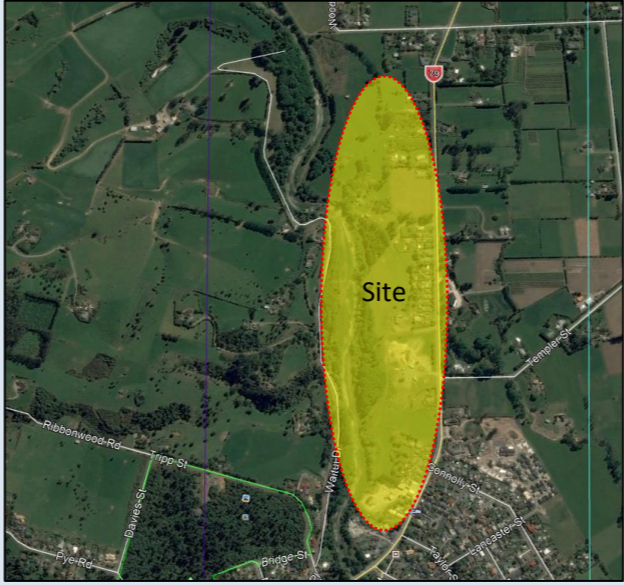


56	Levels Golfing Lifestyles Limited, and Timaru Golf Club	87 Lynch Road, Levels	37, 81, 83 & 85 Lynch Road, Levels (Lots 1,2, 3 & 5 DP 397420)	Rural Residential	  	<p>Located in close proximity to Timaru Airport (1.4km). Despite being outside of statutory noise boundaries, would increase density of incompatible uses in this environment. Located some 6km from Washdyke.</p> <p>At a macro level inconsistent with CRPS 5.3.9 which seeks to avoid development which may constrain the ability of Regional Significant Infrastructure to be used (acknowledging outside of noise boundary). Explanation of 5.3.9 states:</p> <p><i>When developing, modifying, maintaining and operating regionally significant infrastructure, it is not always practicable, or feasible to internalise all adverse effects on the environment. This often influences the quality and character of the environment surrounding such activities. Consequently, care is needed in terms of avoiding, or managing development that if located within the receiving environment of such facilities may affect their efficient and effective operation and development.</i></p> <p><i>Development may result in activities which are incompatible with the efficient use and development of regionally significant infrastructure. These may be incompatible because they:</i></p> <ol style="list-style-type: none"> <i>1. require a quality, character or type of environment which cannot be reasonably achieved in close proximity to such activities</i> <i>2. create features which adversely affect the operation and safety of such activities.</i> <p>Approach would also be contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development.</p> <p>Conclusion: Approach is contrary with CRPS 5.2.1 and 5.3.1 and consolidation approach. Would create expectation with other comparable sites surrounding Timaru. Also there is no ability to demarcate boundaries of the zoning from adjacent properties, no use of geophysical boundaries (roads, streams) to define boundaries. Rezoning Submissions 68, 69 and 56 do not provide a co-ordinated pattern of development.</p> <p>Recommendation: Reject rezoning and retain current Rural 1 provisions.</p>
58	Clarebrook Farms Limited	362 & 376 Claremont Road, Timaru	362 & 376 Claremont Road, Timaru (Lot 4 DP 73829, Lot 2 DP 357414, Lot 2 DP 304117, Lot 2 DP 485156, Lot 1 444516 and Section 12 Rosebrook Settlement)	Rural Residential		<p>Site zoned as Rural 1, some smaller sites (1.8ha) (along the ridgeline but much of the submission relates to larger balance sites), but predominance of larger sites and rural character, sites of 10-20ha are the majority. Area provides a modified rural character and amenity. Subject area is located some 3.0km from urban boundary. Accordingly considered contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development.</p> <p>Conclusion: Approach is contrary with CRPS 5.2.1 and 5.3.1 and consolidation approach. Would create expectation with other similar sites surrounding Timaru.</p> <p>Recommendation: Reject rezoning and retain current Rural 1 provisions</p>

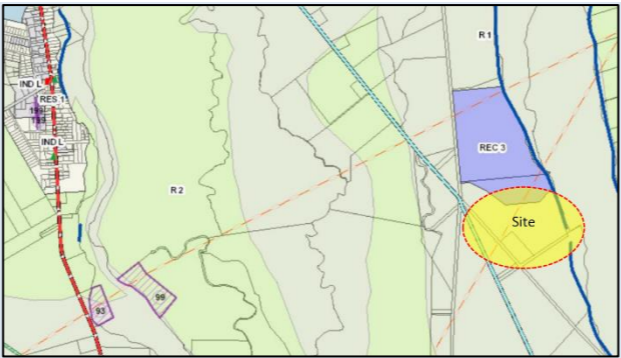


						
61	GW & DS Craig & MWS Clark, KW & SM Pyke, GA & SA Morton & Woolcombe Trustees 2 Limited, GA & SA Morton, JR & JJ Ford, and PG & JA Wilkins & GJA Proudfoot	Pages Road, and Kellands Hill Road		Rural Residential		<p>Site zoned as Rural 1. Predominance of larger sites and rural character, sites average around 10ha. Area provides a general rural character and amenity. Subject area is located some 1.0km from urban boundary at nearest point (Kellands Hill Road access), and some 1.5km at furthest point.</p> <p>On its face, considered contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development.</p> <p>Infrastructure consideration is that roading provision and integration would be uneconomic.</p> <p>As part of larger Kellands Road Rural Residential zone, where demonstrated necessary to provide for supply would overcome policy inconsistency with Policy 5.3.1, as associated with consolidation, but does not resolve roading issues.</p> <p>Conclusion: Approach is contrary with CRPS 5.2.1 and 5.3.1 and consolidation approach. Would create expectation with other similar sites surrounding Timaru.</p> <p>Recommendation: Reject rezoning and retain current Rural 1 provisions</p>
63	ZJ Poplawski, CM & JL Morris, JM & NE Savage, ZJ Poplawski & HC Trustees 2009 Limited, J & B Family Trust, DC & CE Brand & HC Trustees 2010 Limited, DK & MK Coupland & TM Simpson, and DA & RM Coupland & TM Simpson	Gleniti Road, Gladstone Road and Oakwood Road, Timaru	Gleniti Road, Gladstone Road and Oakwood Road, Timaru (Lot 3 DP 70295, Lot 1 DP 52695, Lot 1 DP 20111, Lot 1 DP 325550, Lot 3 DP 26002, and Lot 1 DP 65555)	Rural Residential		<p>Site zoned as Rural 1, some smaller sites (0.5ha) along Ridge of Gleniti Road, but some larger sites and semi-modified rural character, sites of 3-7ha are also present. Area provides a modified rural character and amenity.</p> <p>Proposed 'extension' to Hadlow Area (Appendix 3 in the Submission) relates to predominantly rural sites and activities fronting north towards Oakwood Road.</p> <p>Subject area is located some 1.0km from urban boundary. Area is substantial and disjointed from both existing urban boundary and DGMS Rural Residential. Does not give effect to CRPS 5.2.1(1).</p> <p>Hadlow considered in the Growth Options Assessment (pg 17) and scored poorly, predominantly consolidation, co-ordination and accessibility. Did not make the preference considerations (pg 18). Location to west of Oakwood Road (and Golf Course) means difficult to demarcate a suitable zone boundary.</p> <p>Accordingly considered inconsistent with Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development. Approach also seeks pumped sewer main (para 6.7) in the submission.</p> <p>Conclusion: Approach is inconsistent with CRPS 5.2.1 and 5.3.1 and consolidation approach. Would create expectation with other similar sites surrounding Timaru.</p> <p>Recommendation: Reject rezoning and retain current Rural 1 provisions</p>

						
68	KD & MJ Cahill	50 Falvey Road, Timaru	50 Falvey Road, Timaru (Lot 2 DP 25715)	Rural Residential	<p>Refer Submission No. 56: Levels Golf Course</p>	<p>Located in close proximity to Timaru Airport (1.4km). Despite being outside of statutory noise boundaries, would increase density of incompatible uses in this environment. Located some 6km from Washdyke.</p> <p>At a macro level inconsistent with CRPS 5.3.9 which seeks to avoid development which may constrain the ability of Regional Significant Infrastructure to be used (acknowledging outside of noise boundary). Explanation of 5.3.9 states:</p> <p><i>When developing, modifying, maintaining and operating regionally significant infrastructure, it is not always practicable, or feasible to internalise all adverse effects on the environment. This often influences the quality and character of the environment surrounding such activities. Consequently, care is needed in terms of avoiding, or managing development that if located within the receiving environment of such facilities may affect their efficient and effective operation and development.</i></p> <p><i>Development may result in activities which are incompatible with the efficient use and development of regionally significant infrastructure. These may be incompatible because they:</i></p> <ol style="list-style-type: none"> 1. require a quality, character or type of environment which cannot be reasonably achieved in close proximity to such activities 2. create features which adversely affect the operation and safety of such activities. <p>Approach would also be contrary to contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development. Rezoning Submissions 68, 69 and 56 do not provide a co-ordinated pattern of development. Conclusion: Approach is contrary with CRPS 5.2.1 and 5.3.1 and consolidation approach. Would create expectation with other similar sites surrounding Timaru.</p> <p>Recommendation: Reject rezoning and retain current Rural 1 provisions.</p>
69	P & J McLachlan	417 Timaru - Temuka Highway, Timaru	417 Timaru - Temuka Highway, Timaru (Lot 17 DP 25715)	Rural Residential	<p>Refer Submission No. 56: Levels Golf Course</p>	<p>Located in close proximity to Timaru Airport (1.4km). Despite being outside of statutory noise boundaries, would increase density of incompatible uses in this environment. Located some 6km from Washdyke.</p> <p>At a macro level inconsistent with CRPS 5.3.9 which seeks to avoid development which may constrain the ability of Regional Significant Infrastructure to be used (acknowledging outside of noise boundary). Explanation of 5.3.9 states:</p> <p><i>When developing, modifying, maintaining and operating regionally significant infrastructure, it is not always practicable, or feasible to internalise all adverse effects on the environment. This often influences the quality and character of the environment surrounding such activities. Consequently, care is needed in terms of avoiding, or managing development that if located within the receiving environment of such facilities may affect their efficient and effective operation and development.</i></p> <p><i>Development may result in activities which are incompatible with the efficient use and development of regionally significant infrastructure. These may be incompatible because they:</i></p> <ol style="list-style-type: none"> 1. require a quality, character or type of environment which cannot be reasonably achieved in close proximity to such activities 2. create features which adversely affect the operation and safety of such activities. <p>Approach would also be contrary to contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development. Rezoning Submissions 68, 69 and 56 do not provide a co-ordinated pattern of development.</p> <p>Conclusion: Approach is contrary with CRPS 5.2.1 and 5.3.1 and consolidation approach. Would create expectation with other similar sites surrounding Timaru. Recommendation: Reject rezoning and retain current Rural 1 provisions.</p>

Attachment E:2 – Industrial Rezoning Requests


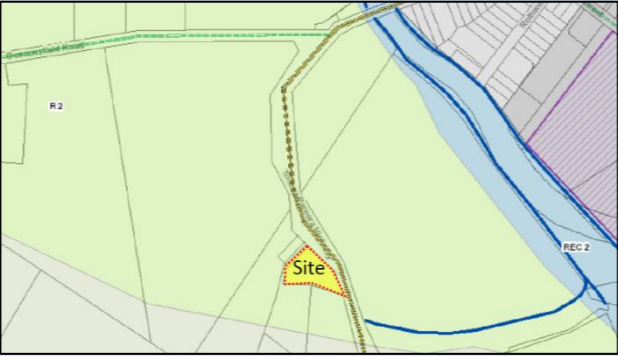

Attachment E:2 Industrial Zoning Requests – Detached from Urban Boundaries

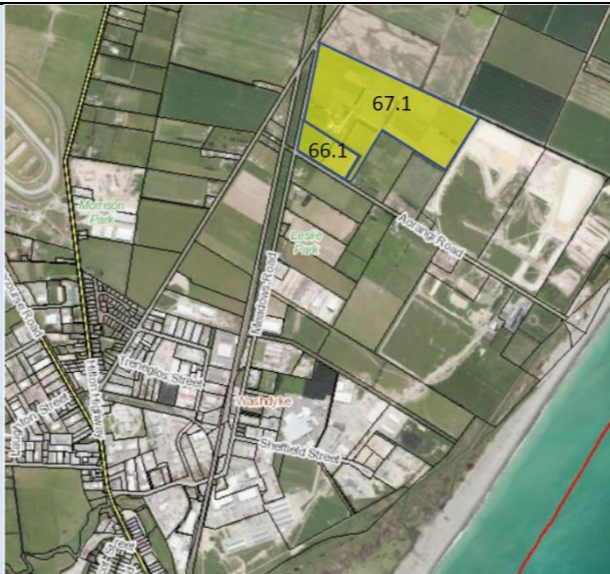
Sub No.	Name	Actual Address	Additional Rezoning Request Location	Requested New Zone	Photos	Additional Detail
6.3	M Thompson	PO Box 2081, Washdyke	Land North West Geraldine currently zoned Rural2 between the Waihi River and the State Highway 72 up to Bennett Road / Woodbury Road	Commercial (Tourism related activities)	 	<p>Submissions suggests could be used for tourism related activities, i.e. accommodation, campervan parking, backpackers and associated services. Site is zoned a combination of Rural 2 and Rural 1. Some distance from urban boundary with Geraldine, and would represent linear development.</p> <p>At a macro level, would require a site-specific zone (tourism related) and also specific application (spot zone). Issues associated with district plan complexity (Section 18A), and also the extent and purpose of the zone. No specific analysis of tourism related demand is contained in the Growth Assumptions Report. However, tourism related facilities should be centralised to promote multiplier and access benefits to a community. Approach would not consolidate activities in terms of CRPS Objective 5.2.1.</p> <p>Area the site has some localised history of inundation.</p> <p>At a micro level., site considered for Industrial (in part) as Orari Back Road (pg 44, 52 of Options Assessment) and scores poorly in terms of Infrastructure (sewer, water and roading) as well as consolidation. Presents an unacceptable risk from inundation and opposed by ECan.</p> <p>Conclusion:</p> <p>Recommendation: Specific zoning approach is contrary to CRPS 5.2.1, 11.2.1 and 11.3.1. Rezoning to foster consolidated tourism activities would not give effect to the RPS. Actual land use proposal better considered by resource consent. Reject.</p>
			Vance Road, Geraldine	Industrial (Transport type business)		<p>Submission identifies Vance Road as a specific Transport type business given issues associated with an absence of Sewer connections. Area already has existing transport and concrete batching.</p> <p>At a macro level, would require a site-specific zone (non-serviced Industrial). Property Economics have identified at a Macro level over supply of industrial land at a district level. Shortfall of industrial at Geraldine results in a need to provide some additional supply. Area is somewhat distant from existing urban area and servicing rendering it less appropriate with CRPS 5.2.1 than Tiplady Option.</p> <p>At a micro level., site considered for Industrial as Vance Road (pg 44, 52 of Options Assessment) and scores poorly in terms of Infrastructure (sewer, water and roading) as well as consolidation. Falls well short of Tiplady in terms of ‘appropriateness’ in achieving higher order Policies and Objectives. Existing activities present (gravel and quarrying) are dependent on the existing rural resource. Amenity associated with river corridor and mountain bike park in the vicinity.</p> <p>Conclusion:</p> <p>Recommendation: Specific zoning approach is inconsistent with CRPS Objective 5.2.1</p>

						
27.1	R Payne		Vacant former railway land at Orari.	Industrial L	<div><p>Figure 1: Orari Site from Macdonalds Road</p><p>Figure 2: Ex Railway platform</p></div>	<p>The submission states:</p> <p><i>Vacant former railway land at Orari, now in private hands (C/- Alistair Thomas, Winchester Ph 615 9512) should be promoted by Council for light industrial use. Roading, power, water, infrastructure exists adjacently. Sewerage technology can be applied. Some of the east railway land could be developed for car pooling parking and reopened railway parking.</i></p> <p>The site is zoned Residential 3 in the Timaru operative plan. The site is vacant, and contains residential to the north-west adjoining Macdonald Street, and a rural residential dwelling to the east. There is a dispute as to servicing, your e-mail (10 August) states that there are no Council services, the submission records that services (water) is available and that sewerage can be provided.</p> <p>At a macro level, Property Economics have identified that there is a surplus of zoned and serviced infrastructure supply to service demand in the long term.</p> <p>At a micro or local level, rezoning the site to Light Industrial would result in effectively a ‘spot zone’ of Industrial land within a sparsely populated urban area (residential to west is low density), with sensitive adjoining properties along the north-western boundary, and on the east.</p> <p>The site is 80m wide and would require careful consideration and layout (reducing developable area) of access to avoid multiple access points along MacDonald Road (a low intensity local road).</p> <p>In terms of infrastructure, MacDonalds road is formed, but the site has no frontage to the State Highway (40m-50m separation) and no rail siding is available providing access to the rail network. There would likely be requirements for setbacks from the South Island Rail Trunk line, albeit these uses would be less sensitive than the zoned Residential 3. The rail corridor itself is designated (Designation No. 169).</p> <p>It is anticipated that there would be little general demand for Industrial uses and an absence of local employment base (thereby likely increasing trip generation and length), although this doesn’t rule out a specific / niche demand.</p> <p>The Industrial L zone is defined in the Plan¹ as:</p> <p><i>Industrial L: which is intended to provide for industrial activities having minor to moderate environmental effects and that these effects should be mitigated for neighbouring zones to the extent that is practical.</i></p> <p>Accordingly, the proposal would be troubled by:</p> <ul style="list-style-type: none">• Nuisance provisions in the Timaru District Plan that apply the more sensitive (Residential 3) controls at the interface² (i.e. noise Rule 5.13(b))• Zoning for a clearly urban use with likely moderate levels of discharge in the absence of services is inconsistent with existing operative plan provisions that seek to ensure adequate infrastructure is provided to enable development (Chapter 9, Objective 1, Clause 4.1.2.2). Reliance on ‘<i>the site can still be used for industrial if they can resolve services themselves with Ecan</i>’ (10 August request) is not tenable. <p>The rezoning would achieve the following in terms of the CRPS:</p> <ul style="list-style-type: none">• Objective 5.2.1(2)(a) enable people to provide for economic wellbeing.

¹ Clause 4.1.2.2


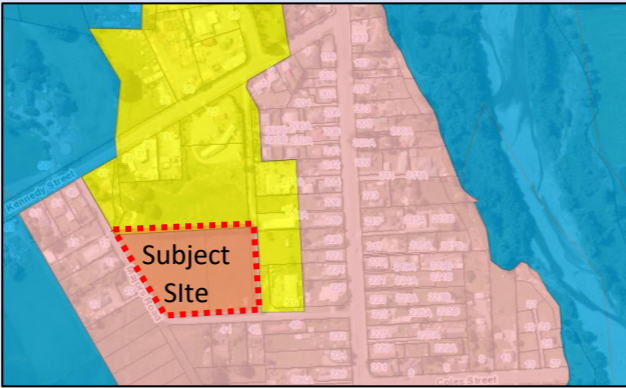

² Clause 4.1.2.7





						<p>The rezoning would not achieve the following in terms of the CRPS:</p> <ul style="list-style-type: none"> Objective 5.2.1(2)(c) sustainable economic development through business activities in appropriate areas. Appropriate in this context is considered to be able to be efficiently serviced and provide for the local employment base. Objective 5.2.1(2)(i) avoids conflicts between incompatible activities (the range of activities provided for would be reduced given the need to meet interface nuisance standards). Objective 5.2.2(2) to achieve patterns and sequencing of land-use that (c) increases sustainability, efficiency and liveability (Regionally Significant Infrastructure as defined includes 'sewage collection, treatment and disposal networks' and 'community potable water systems'). Council has not provided servicing to Orari, providing for this site alone would be inefficient. Objective 5.2.3 which seeks an efficient and effective transport system that supports a consolidated and sustainable urban form. Orari would not be able to supply sufficient employment base for the full spectrum of Industrial L activities. A specific low density rural industrial / contracting activity would however be appropriate. Policy 5.3.2(2)(b) careful design would be needed to avoid reverse sensitivity effects on adjoining residential. Policy 5.3.3(3) the rezoning would not support the efficient or effective provision of sewer or water services. <p>Conclusion:</p> <p>The site retains the Residential 3 zoning. Rezoning to Industrial L would be less appropriate given the small scale of the site, absence of residential employment base, and incompatibility with surrounding activities. All of these matters are accounted for in the CRPS provisions above.</p> <p>The absence of appropriate servicing results in a proposal that is contrary to the operative Timaru District Plan, and inconsistent with the CRPS. That is not to say that a specific resource consent for a resource consent would necessarily be inappropriate. A resource consent is the appropriate mechanism to consider a non-residential use.</p>
50	SM Fraser, AJ Shaw and PA Johnston	54 & 56 Timaru-Pareora Highway, Timaru	54 (Lot 2 DP 18867) & 56 (Lot 1 DP 33121) Timaru-Pareora Highway, Timaru	Industrial L	 	<p>Site zoned as Rural 1. Surrounded by Rural activities and separated from Timaru Urban area by 600m (Redruth) and Salt Water Creek (which demarcates the southern urban boundary of Timaru). Subject site contains a number of low level buildings and large areas of gravel, with little planting or landscaping. General open in terms of views and character. Presumed activity was 'lawfully established' and subject to conditions which manage adverse effects and extent of development.</p> <p>At a macro level. Industrial zoning would be contrary with consolidation approach in CRP5.2.1, site is also difficult to service efficiently given distance to Redruth and existing services (inconsistent with CRPS 5.3.5 which seeks efficient servicing for development, including sewer and water), and would not result in a defensible urban boundary (and create expectations for linear industrial development down this corridor).</p> <p>At a micro level, already contains logistics yard type activities which requires little servicing.</p> <p>Conclusion: Approach is contrary with CRPS 5.2.1, 5.3.1 and 5.3.5.</p> <p>Recommendation: Retain rural zoning.</p>
66.1	McCleary et al	236 Meadows	Lot 1 and 2 DP432561,	Rezone 4.1 ha		Site zoned as Rural 1.

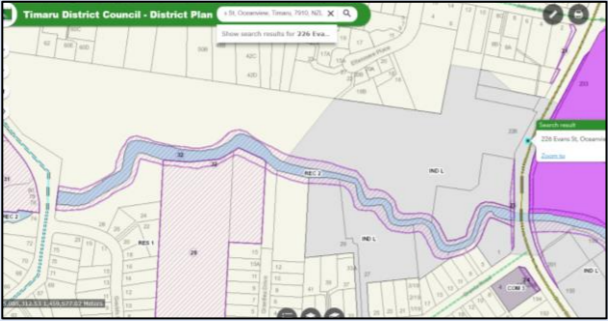



		Road	Access Meadows Road	to 'Deferred Type' Industrial zoning, with staging and ODP for Infrastructure provision.		At a macro level. Industrial zoning would be inconsistent with consolidation approach in CRP Objective 5.2.1 , as Attachment A (Property Economics) identifies considerable supply of industrial land to meet demand, and this site does not adjoin existing urban area. Site is relatively easy to service (refer Infrastructure Assessment, with some benefits in terms of increasing TDCs upgrade investments on Meadows and Aorangi Road).
67.1	LP and JA Moodle	236 Meadows Road	Lot 3 DP432561, Access Meadows Road	Rezone 25.75 ha to 'Deferred Type' Industrial zoning, with staging and ODP for Infrastructure provision.		<p>However, would not be able to serviced efficiently given:</p> <ul style="list-style-type: none">(a) Distance to existing Washdyke Industrial zone (500m); and(b) Surplus of zoned and serviced Industrial land present in Timaru and Washdyke that exceeds long term (2048) demand. <p>Overall considered inconsistent with CRPS Policy 5.3.5 which seeks efficient servicing for development, including sewer and water), and would not result in consolidation CPRS Objective 5.2.1. Would not provide for <i>attached</i> development in terms of Policy 5.3.1, nor provide for co-ordinated development.</p> <p>At a micro level, retained rural character and amenity.</p> <p>Conclusion: Approach is contrary with CRPS 5.2.1, 5.3.1 and 5.3.5.</p> <p>Recommendation: Retain rural zoning.</p>



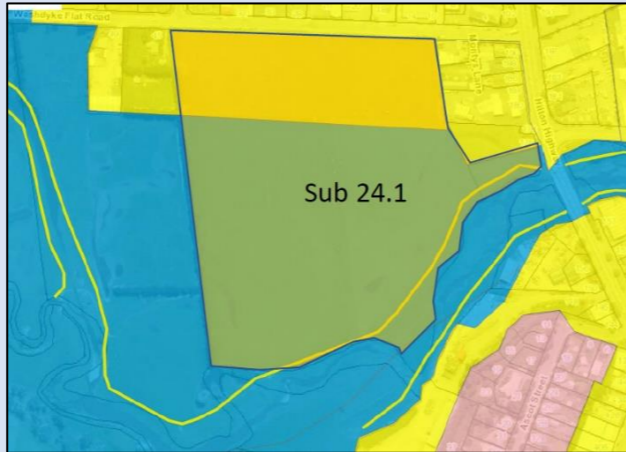
Attachment E:3 – Business Rezoning Requests


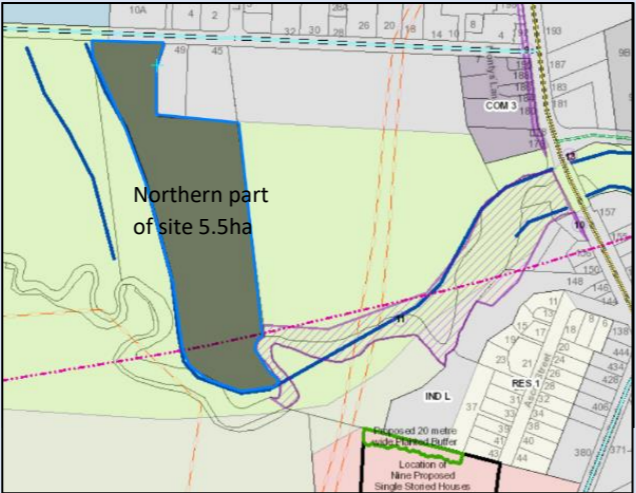
Attachment E:3 Business Zoning Requests – Section 6

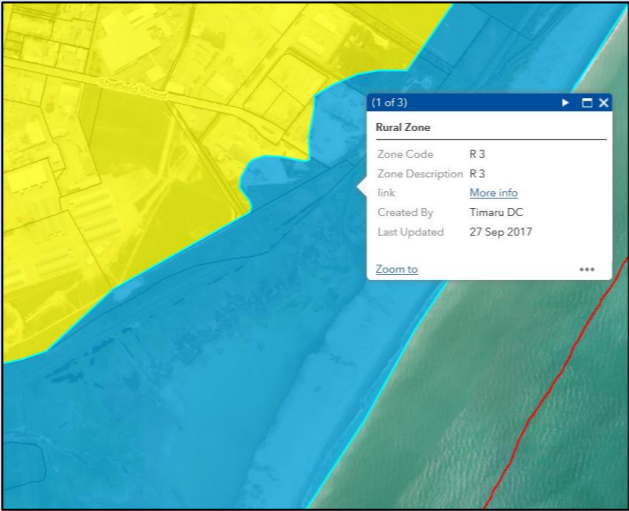

Sub No.	Name	Actual Address	Additional Rezoning Request Location	Requested New Zone	Photos	Additional Detail
47	SM Fraser, AJ Shaw and PA Johnston	54 & 56 Timaru-Pareora Highway, Timaru	54 (Lot 2 DP 18867) & 56 (Lot 1 DP 33121) Timaru-Pareora Highway, Timaru	Industrial L	<div></div>	<p>Site zoned as Residential 1. But sites to the north and east are zoned Industrial L.</p> <p>Majors Road to the south and west provides a geographic demarcation of a zone boundary. Frontage to these sites is planted with landscape buffer.</p> <p>Section 2 SO463296 is already utilised for Marsden Engineering Ltd, with recent (less than 5 years old) warehouse and associated offices. These buildings and activities will not easily revert to residential occupation as reflected by underlying zoning.</p> <p>Industrial L and nuisance provisions within the District Plan would also ensure that residential amenity to the south and east was maintained.</p> <p>Infrastructure report identifies servicing is acceptable, but some issues with width of Majors Road in terms of access.</p> <p>At a macro level, Industrial zoning (1.4ha) would not impact on macro level district oversupply, and assists with Geraldine Settlement undersupply of Industrial land (1.19ha zoned, serviced and available) to meet local demand.</p> <p>Industrial zoning would be consistent with consolidation approach in CRP5.2.1, site can be serviced (CRPS 5.3.5 which seeks efficient servicing for development, including sewer and water), and would result in a defensible Industrial L boundary.</p> <p>At a micro level, already contains logistics yard type activities which requires little servicing, and has landscape planting along frontage. Rezoning the District Plan will require activity rules to retained landscaped setbacks at the residential interface, manage noise and nuisance and manage the volume of traffic generation, to achieve (CRPS Policy 5.3.1(5)).</p> <p>Conclusion: Approach is consistent with CRPS 5.2.1, 5.3.1 and 5.3.5.</p> <p>Recommendation: Rezone Industrial L.</p>

51	Port Bryson Property Ltd	16-18 Hilton Highway, Timaru	16-18 Hilton Highway, Timaru	Commercial (Business Park)	  	<p>The relief should be considered in two parts:</p> <ul style="list-style-type: none"> 16 Hilton Highway (8,624m²) is utilised for Industrial type activities (Trade Suppliers, Bike Concepts (Bike sales) and Lock Up sheds). Buildings on the site containing these activities are relatively recent. This part of the subject site exhibits no residential character nor amenity, and with direct frontage to the State Highway would further reduce any propensity to develop for residential development. The submission seeks commercial business park, including specialist low volume retail and servicing. 18 Hilton Highway (1.21ha) is also zoned Residential 1 (as subject to the Broughs Gully Outline Development Plan) and is currently largely vacant. Site access is provided to the State Highway, but would also be available (in future) by access to Tasman Street. <p>There is no detail contained in the submission, nor obvious environmental factors that would mean that an industrial zoning for 18 Hilton Highway represents a better, or more appropriate zone than the current residential zone. In particular, rezoning of 18 Hilton Highway would increase the extent of industrial / residential interface, and the potential for amenity and reverse sensitivity issues at that boundary. Such an outcome would be less consistent with CRPS provisions seeking to avoid conflicts between incompatible activities (Objective 5.2.1(2)) and Police 5.3.2(2)(b)). Accordingly, rezoning 18 Hilton Highway from Residential to Industrial is recommended to be rejected.</p> <p>For 16 Hilton Highway, at a micro level the site contains industrial and trade based activities which are suitable given low transport characteristics and frontage with State Highway. Industrial L zoning whilst a ‘spot zone’ would be more appropriate than current Residential 1 zone. Some care would be needed at the residential interface including landscape and setback requirements at that interface through District Plan requirements.</p> <p>At a macro level 16 Hilton Highway is within affixed to the urban boundary and also has access directly to State Highway 1. Accordingly, uses would need to ensure traffic generation volumes were managed to prevent side friction with State Highway. Promotion of commercial zoning would result in spot zone and would not consolidate commercial activity in the Town Centre (inconsistent with Policy 5.3.1).</p> <p>Conclusion: Rezoning to provide for Industrial L zone would be more appropriate with CRPS than current residential zone, and reflect existing environment.</p> <p>Recommendation: Industrial L for 16 Hilton Hwy only, site represents infill and reflects current land uses and hence does not provide vacant land opportunities for growth. Accordingly, does not need to be specifically identified in the GMS.</p>
57	Harvey Norman Properties (N.Z.) Limited	226 Evans Street, Timaru	226 Evans Street, Timaru (Part currently zoned Industrial)	Commercial		<p>Area of Industrial L some 5ha. Majority of Industrial L zone not built out, but characterised by logistics, with Harvey Norman having a modest presence on north eastern corner. PGC Wrightons located on southern frontage corner of access. Car parking for Harvey Norman separate from remainder of block. Consent No. 102.2014.147 provided consent for the expansion of the existing Harvey Norman from 3,300 to 6,530m². The 3,300m² of Harvey Norman is inclusive of its 1,000m² warehouse facility. That consent limits activities to activities permitted in the Industrial L zone. Consent was a non-complying activity as it extended onto the Residential zone.</p> <p>Accordingly, the statement in the submission that:</p> <p>“The land use character of “Area E” has overtime, become “incompatible” with its underlying Industrial zone. “Area E” is, for all intents and purposes, a commercial and large format retail precinct, and is likely to remain so indefinitely. It is therefore logical that the District Plan Review should re-zone “Area E” to a commercial zone to reflect its existing and consented issues” is considered incorrect.</p> <p>At a macro level the proposal is inconsistent with CRPS 5.2.1 and 5.3.1 as these relate to a co-ordinated pattern of development.</p>

					<div></div> <div></div>	<p>Recommendation: Reject rezoning and retain current Industrial L provisions</p>
5	Timaru District Holdings Limited	2 King George Place, Timaru	Showgrounds Hill, Timaru	Industrial L & Commercial 2A	<div></div> <div></div>	<p>A & P Showgrounds site (Pt Lot 25 DP 578 and Pt Lot 1 DP 3955). Site is 12ha, purchased by TDHL in April 2017. Submitter seeks that in addition to Large Format Retail, the site can also be used for Light Industry. Amenity controls (ODP) for Taitarakihi Creek.</p> <p>Site is zoned Commercial 2A Large Format Store (Retail Park) zone. Which permits Retail >500m2, Restaurants and Trade Suppliers. Sequential release of general merchandise to 34,000m2GFA by 2027. All other activities not otherwise specified (including Light Industrial) are a Non-Complying Activity Rule D3-5.3</p> <p>At a macro level the zoning provides for Large Format not otherwise accommodated in the Commercial centre zones. Also accounted for in Property Economics (2015) Report – concluding no additional land would needed to accommodate retail activities in the district. There are likely opportunity costs if rezoned to promote industrial uses, noting that Property Economics have identified a surplus of serviced Industrial land, so capacity for these activities is not an issue.</p> <p>CRPS provisions of relevance include: 5.2.1(1) and (2)(c) which respectively seek to achieve consolidation, and also enabling business in appropriate locations. CRP 5.2.1(2)(i) seeks to avoid incompatible activities. Policy 5.3.1 seeks a co-ordinated pattern of development. Key issue is that the zone was established to provide opportunities for large format that could not be located in the town centre. If opportunities are demonstrably reduced could lead to requests for disparate large format locations to the detriment of urban form and the town centre.</p> <p>At a micro level provides greater diversity of activities, some control needed so as not to generate reverse sensitivity effects or otherwise reduce commercial supply. Surrounded to east by Industrial Heavy, and Industrial L to the south and east. No immediately sensitive neighbours.</p> <p>Servicing is not an issue. That is provided for commercial, so would likely provide capacity for dry level (industrial light) demands.</p> <p>Conclusion:</p> <p>Recommendation: Amend non-complying status for Light Industrial in the District Plan hearings, but retain some discretion relating to extent, incompatibilities and amenity.</p>




						
24	Seadown Properties		Lot 6 DP578	<div></div>	<p>The subject site is some 10.7ha with the front portion zoned Industrial L, and the balance (approx. 7ha) zoned Rural 2. That part of the site zoned Industrial L is the subject of resource consent to establish 9 lots of between 1700m² to 3,500m².</p> <p>At a macro level, and as identified in the Property Economics Report, there is a district wide surplus of available industrial land beyond 2048. Accordingly, at the macro level, there is no pressure for additional Industrial land to be rezoned to supply the market.</p> <p>However, at the micro level, this relief only relates to an additional (approx.) 7ha of Industrial zoned land, and is also consistent with a number of matters within the statutory framework, including that it is bounded on three sides by urban uses, and has good access to the transport network and associated services. Essentially, the site represents an appropriate use and infill of the area for Industrial uses.</p> <p>Economics: Tim Heath at Property Economics has advised for this site that:</p> <ul style="list-style-type: none">As the site can be connected to existing servicing, this would represent a more efficient proposition compared to servicing other vacant but zoned industrial land further out.Given that the front of the site is zoned Industrial, the balance of the site is unlikely to be able to be pragmatically used for other land uses. Also, the industrial strip on the front part of the site would affect the viability of any land use development on the back portion of the site, if zoned for another use. Commercial realities are likely to mean the back portion of the site is only really useful for industrial activity (or sport fields if there's a shortage in Timaru, albeit there are probably many better located alternative sites available if there was).The site sits within a large wider industrial area, therefore there is the opportunity to create economic efficiency benefits from the clustering effect of industrial activities, particularly when compared to the alternative zoned options further afield.The rezoning is a natural fit in with the existing urban form and function of the industrial area, so a common-sense response can be considered more alike to brownfield infill rather than expansion of the area. <p>Natural Hazard Risk: Chris Fauth from Environment Canterbury has advised that:</p> <ul style="list-style-type: none">Overall the flood risk to the property is low.The site is mostly protected from flooding by a newly upgraded stopbank that is designed and built to protect the area from flooding from Papaka and Washdyke Streams in up to and including the 500 year ARI flood event. This is as high a standard of flood protection that is afforded to any part of South Canterbury. A stormwater channel carrying runoff from the north side of Washdyke Flat Road runs through the western side of this area and discharges water through the stopbank and into the creek via a flood-gated culvert. This may cause local runoff flooding when the flood gate is closed (along with general runoff and ponding from heavy rain) during significant rainfall events. Environment Canterbury doesn't however have any specific records on the extent of such flooding.The other aspect to these areas is their proximity to the stopbank. The Timaru District Plan has a “catch all” type rule that makes building within 100 m of a stopbank a discretionary activity. In this case though there are several factors that really minimise the potential for a stopbank breach. These include:<ul style="list-style-type: none">Design floodwater velocities in the creek are expected to be quite low during a major floodThe banks on the opposite side of Papaka Stream are lower and water in that source will tend to overtop on that side reducing pressure on the stopbank adjacent to this area.Because the creek is a single and not multi channel system the risk of lateral bank erosion is much reducedAny bank erosion that occurs will be quickly repaired by Environment Canterbury on behalf of the river rating district in place for the creek. <p>When considering these factors. There is very little chance of a stopbank breach occurring into this area.</p>	



						<ul style="list-style-type: none">- A small part of the southern end of the above areas is located on the creek side of the stopbank. These parts are inappropriate for development. 7.5 m width of land on the “landward” side of the stopbank also falls under the jurisdiction of the Canterbury Regional Council Drainage and Flood Protection Bylaw. This bylaw aims to protect future access to drainage and flood protection works for maintenance/upgrade purposes etc. Any activity carried out within 7.5 m of the stopbank will need approval from Environment Canterbury River Engineering staff under that bylaw. <p>The Options Report (pg 55), which identified this areas as <i>Laughton</i> recommended that a broader 21ha rezoning option be recommended. In light of the Property Economics report that extent of rezoning would be excessive. However, this relief achieves the following, and is therefore recommended to be accepted.</p> <ul style="list-style-type: none">- <i>This option is located in Washdyke, west of State Highway One and north of Washdyke Creek.</i>- <i>The Washdyke Flat Road frontage of this option is currently zoned Industrial L. The majority of the option is zoned Rural 2.</i>- <i>This option is generally level with some potential flooding in the lowest lying areas close to Washdyke Creek.</i>- <i>This option is easily accessed from State Highway One, via Washdyke Flat Road.</i>- <i>From a landscape point of view, this option is very acceptable given it is located between two existing industrial areas.</i>- <i>Servicing of this option for industrial use is very achievable given the location of reticulated services within Washdyke Flat Road immediately adjacent to this option.</i>- <i>This option is not suitable for Industrial H zoning (heavy Industrial land use activities) due to a lack of trade waste sewer and high capacity water supply.</i> <p>In addition:</p> <ul style="list-style-type: none">- This option constitutes some 5.1 hectares (Developable).- There is a demonstrable development plan for the site, as included in the submission – and consent is being sought for Stage 1. <p>In terms of costs against the proposal:</p> <ul style="list-style-type: none">- Property Economics have identified that there is a district level surplus of Industrial land supply to meet projected demand. The impacts of oversupply are set out in Section 6 of their report (Attachment A). The likely consequences of the rezoning of this area, will likely mean that already zoned, but vacant or deferred industrial land will remain dormant and underutilised. <p>Rezoning to Industrial land would be consistent with the consolidation approach in CRPS Objective 5.2.1(1) and enable economic enablement under Objective 5.2.1(2) through encouraging business activities in appropriate locations (Objective 5.2.1(2)(c), and is not susceptible to unacceptable flood risk (CRPS Policy 11.3.1).</p>
48	SM Fraser, AJ Shaw and PA Johnston	45 Washdyke Flat Road, Washdyke	Lot 6 DP578			<p>The subject site is some 10.2ha with a corner on the north-east frontage with Washdyke Flat Road being zoned Industrial L, and the balance (approx. 9.5ha) zoned Rural 2. Developable land on the northern bank of the creek, within the contained stopbank as zoned Rural 2 is some 5.5ha</p> <p>In terms of natural hazards, Chris Fauth from Environment Canterbury has advised that the smaller portion to the south of the creek is inappropriate to rezoned for Industrial activities. <i>Three quarters approx. of this area is relatively low-lying, unprotected by the stopbanks, and will be flooded from the creek on a frequent basis. In large floods deep flooding over this area can be expected. The lower parts of the area will also have the potential to be generally “wet” in winter conditions and will collect local runoff. The southern most approx. quarter of the area is steeply rising land that will get up above the flooding.</i></p> <p>The balance of the site, north of the creek is of a low flood risk as identified for the adjoining site to the east (Sub 24.1 Seadown), and hence is not susceptible to unacceptable flood risk (CRPS Policy 11.3.1). The southern portion of the submission is recommended to be rejected.</p> <p>As above, at a macro level, and as identified in the Property Economics Report, there is a district wide surplus of available industrial land beyond 2048. Accordingly, at the macro level, there is no pressure for additional Industrial land to be rezoned to supply the market.</p> <p>At the micro level it is acknowledged that the site, as part of the <i>Laughton</i> growth option (pg 55 of the Options Assessment) scored well on a number of factors. It is noted that the subdivision design for the adjoining property (Sub 24, Seadown) does not connect to this site in terms of a through road, nor does the two Industrial rezoning options in this submission provide for ease of coordination between existing urban developments.</p> <p>At the micro level, this relief relates to an additional (approx.) 5.5ha of Industrial zoned land, the proposal is less consistent with matters within the statutory framework as associated with Submission 24 (Seadown), including that it is not bounded on sides by existing urban developments, although it is very much urban fringe and does have relative good access to the transport network (for that part of the site fronting Washdyke Flat Road) and associated services.</p> <p>Specifically, In relation to this proposal:</p> <ul style="list-style-type: none">- This option constitutes some 5.5 hectares (northern extent only);

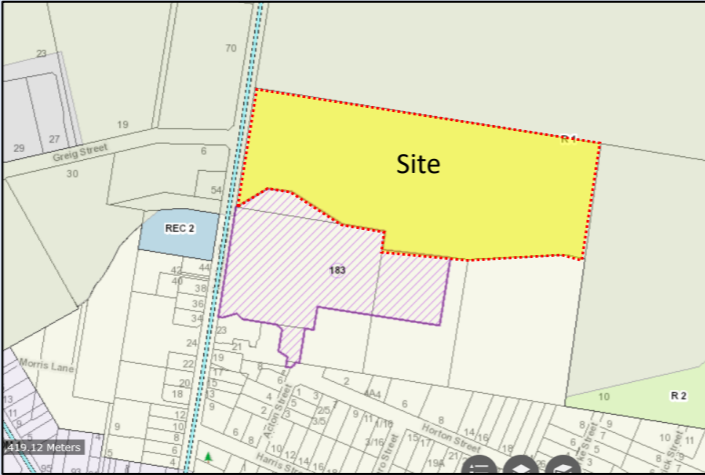


						<ul style="list-style-type: none">- It is not bounded on all sides by existing urban development, and is more akin to green field expansion compared to Sub 24.- There is no demonstrable development plan for the site, nor integration with surrounding development- There is a macro overprovision of zoned and available Industrial land available in the area. <p>Property Economics have identified that there is a district level surplus of Industrial land supply to meet projected demand. The impacts of oversupply are set out in Section 6 of their report (Attachment A). The likely consequences of the rezoning of this area, will likely mean that already zoned, but vacant or deferred industrial land will remain dormant and underutilised. However, whilst it is comparable in a number of instances to Sub 24 Seadown in terms of the economic rationale for supporting the rezoning, it is less co-ordinated and would not further consolidation CRPS Objective 5.2.1(1) to the same degree. The rezoning would enable economic enablement under Objective 5.2.1(2) (Objective 5.2.1(2)(c), and is not susceptible to unacceptable flood risk (CRPS Policy 11.3.1).</p> <p>Accordingly, whilst noting that this matter is finally balanced, but somewhat distinguishable from Sub 24 Seadown, it is recommended that the submission be rejected. If the Hearings Panel reaches a different conclusion, endeavours should be undertaken through the replacement District Plan process to seek to ensure service integration (roading, sewer and water supply) between this block and the adjoining site (Sub 24 Seadown).</p>
44 and 45	PSE Properties el and Juice Products et al	Sheffield Street Timaru	Washdyke	Rural 3 to Industrial H.	 	<p>Site is zoned Rural 3. Submission seeks rezoning to Industrial H.</p> <p>The site(s) adjoin the existing Industrial H zones associated with Washdyke, and hence would achieve CRPS provisions with regard to developing attached to an existing urban area. However, approach would be less consistent with consolidation aspects of Objective 5.2.1 and Policy 5.3.1 given oversupply of Industrial land, however given modest extent this would not be fatal to such a rezoning.</p> <p>However, site is subject to considerable high hazard risk and hence considered contrary to Objective 11.2.1 which seeks to:</p> <p><i>Avoid new subdivision, use and development of land that increases risks associated with natural hazards</i></p> <p>and Policy 11.3.1 which seeks the avoidance of inappropriate development in high hazard zones.</p> <p>Environment Canterbury have advised:</p> <p><i>“This area subject to a range of natural hazards. The area is close to an eroding coastline which will reach it well within building consent timeframes. There is coastal inundation risk. Development at this location will also impede freshwater drainage and flood flow paths as drainage and floodwater from the land to the north has to travel through this area, into the lagoon, and out to sea via the only available outlet on this stretch of coastline. Environment Canterbury would recommend against any development at this location”.</i></p> <p>Recommendation: Reject.</p>

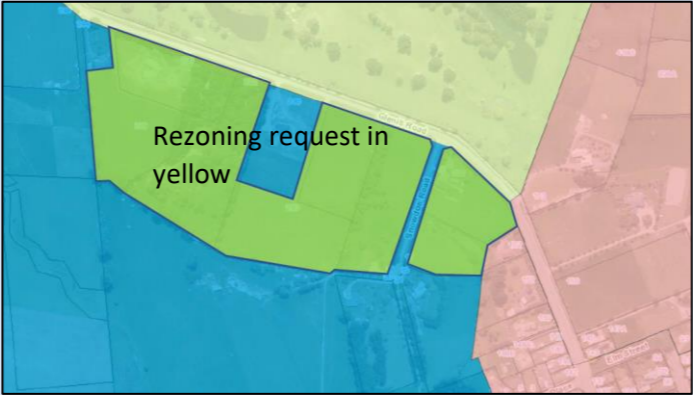
Attachment E:4 – Rural Residential Rezoning Requests Section 7

Attachment E:4 Rural Residential Zoning Requests – Section 7

Sub No.	Name	Actual Address	Additional Rezoning Request Location	Requested New Zone	Photos	Additional Detail
16	BJ & JEM O'Keefe, DG & ML Earl, and J & S Nichelsen	16 Burdon Road, Woodbury, RD 21, Geraldine	16-36 & 42 Burdon Road (Lots 2 & 3 DP 5765, Lot 2 DP 1364 BLK VII Orari SD, and Lot 3 DP 415886) and 568 Woodbury Road (Lot 3 DP 1364), Woodbury	Rural Residential	  	<p>Sites are zoned Rural 1 and located between Woodbury (zoned Residential 3) and Recreation 3 zone. Sites range in size from 2.5ha to 4.0ha as fee simple, but all under one ownership (O'Keefe). Closest urban settlement is Geraldine (7.0km as the crow flies). Cricket pitch and recreation centre to the east, school to the south (across Woodbury Road). 'Woodbury Rhododendrons' sales from one of the premises, and properties currently for sale. Buildings include mainly farm sheds and main residential dwelling. Rural character predominates on the properties and to the north east (expansive pastoral), although smaller rural lifestyle properties to the north.</p> <p>At a macro level, sites display some rural residential character but still function as a productive rural area. Approach would not be consistent with CRPS Policy 5.3.1 as rural residential would not be in a form that provides a co-ordinated pattern of development (absence of services to support community of interest) and substantial distance from Geraldine. Not contrary to that approach as is attached to an existing (but un-serviced urban area). Would be difficult to distinguish between this site and many others in the district, where rezoning to rural residential would lead to expectation to rezone other similar sites. Less appropriate in terms of providing quantum for rural residential development given</p> <p>At a micro level residential to the west, and recreation (cricket ground) to the east. So limited ability to result in incompatible activities on the boundaries. Smaller lot subdivisions to the north, each with a dwelling.</p> <p>Conclusion: Approach is less appropriate with CRPS 5.3.1 and consolidation approach, given distance to substantial urban settlement. Would create expectation with other similar sites.</p> <p>Recommendation: Reject rezoning, noting that there are merits associated with this proposal.</p>

26	J Scott	82 Smart Munro Rd, 4 RD, Timaru	Land between Manse Road, Smart Munro Road and a paper road joining the two roads at Pleasant Point	Rural Residential		<p>Adjoins Shere Street to the south and the township. Topography is mainly flat but at the top of a rise which impacts on infrastructure provision. The site is currently held in single ownership, and largely unmodified in terms of rural character. Site slopes down to Smart-Munroe Road and retains a rural character in this location.</p> <p>At a macro level additional Rural Residential zoning is considered inappropriate given NZ Stats projections and Manse Road option to meet demand. Additional zoning is less appropriate in terms of achieving consolidation outcomes given reduced projections, therefore inconsistent with CRPS Objective 5.2.1.</p> <p>At a micro level, some potential for reverse sensitivity effects, and slightly less (relative to Manse east) access to the urban area.</p> <p>Conclusion: Approach is inconsistent with 5.2.1 primarily due to the release of too greater an area for rural residential development at the expense of consolidating development at Pleasant Point.</p> <p>Recommendation: Reject rezoning</p>
28	R Hay	101 Te Ngawai Road, Pleasant Point	101 Te Ngawai Road, Pleasant Point	Not Specified		<p>Area is zoned Rural 1 in the District Plan, and adjoins the Residential 1 boundary to the south east. Whilst only 1.6ha th site is identified by ECan as being subject to inundation, meaning that rezoning for more intensive uses would be inappropriate. In reality, the site would exist as a Rural Residential property regardless, but with rural zoning provisions. Stand-alone zoning would act as a spot zone (Section 18A RMA), and would be difficult to distinguish from other sites. Mixture of older and contemporary dwellings down this linear extent of Te Ngawai Road. Sporadic rural views beyond frontage which tends to be more built out.</p> <p>CRPS Objective 11.2.1 and Policies 11.3.1, 11.3.2 Seeks to ‘avoid’ new subdivision, use and development that increases risks associated with Natural Hazards. Approach would also be contrary to Strategic Direction [4] Building resilient communities which seeks to avoid development in high hazard areas where risk from natural hazards is assessed as unacceptable.</p> <p>Rezoning would be largely consistent with CRPS Objective 5.2.1 in terms of consolidation as the site adjoins an urban boundary, but would promote a spot zoning approach.</p> <p>Services would be available given located surrounded by serviced urban area.</p> <p>Conclusion: Approach is contrary to CRPS 11.2.1 and 11.3.1. Rezoning to residential would not give effect to the RPS overall, despite consistency with consolidation approach.</p> <p>Recommendation: Reject rezoning</p>

74.1	S Hilton	Lot 1 DP5504	Halstead Road, Pleasant Point	Rural Residential	 	<p>The 7.5ha property, legal description Pt Lot DP5504 is zoned Rural 1 in the operative District Plan. Site retains rural character and amenity.</p> <p>The site adjoins the designated Pleasant Point Primary School to the north, with Pleasant Point further south as zoned Residential 1.</p> <p>The submission seeks a rural residential rezoning, or alternatively a corridor of housing along the Halstead Road frontage.</p> <p>At a macro level additional Rural Residential zoning is considered inappropriate given NZ Stats projections and Manse Road option to meet demand. Additional zoning is less appropriate in terms of achieving consolidation outcomes given reduced projections, therefore inconsistent with CRPS Objective 5.2.1 despite adjoining the urban boundary.</p> <p>Critically, Chris Fauth from Environment Canterbury has advised that:</p> <ul style="list-style-type: none"> - This property was affected by deep flooding in the March 1986 flood. That flood was a greater than 100 year Average Recurrence Interval (ARI) flood in the Te Ngawai River. - Flood Modelling completed by Environment Canterbury this year indicates that the property will be affected by deep flooding in the vicinity of one metre or more in the 200 year ARI flood event. Flood depths will obviously be greater still in the 500 year ARI flood. - The majority of the property meets the criteria for being described as prone to high hazard flooding with depths exceeding one metre comfortably in the 500 year ARI flood for the vast majority of the property. Environment Canterbury would recommend against residential development over most of the property. - There are a few small areas of the property that are knobs or ridges of higher ground where flooding will be significantly less. These areas are isolated but may create limited space for a small number (1 – 3?) of buildings that would be clear of high hazard flooding but would still require moderate elevation of floor levels to meet District Council Plan rules. <p>CRPS Objective 11.2.1 and Policies 11.3.1, 11.3.2 Seeks to ‘avoid’ new subdivision, use and development that increases risks associated with Natural Hazards. Approach would also be contrary to Strategic Direction [4] Building resilient communities which seeks to avoid development in high hazard areas where risk from natural hazards is assessed as unacceptable.</p> <p>Conclusion: Approach is contrary to CRPS 11.2.1 and 11.3.1. Rezoning to rural residential would not give effect to the RPS overall.</p> <p>Recommendation: Reject rezoning</p>
64	AJ & CA Brosnahan, AR & FE Gale, AS Rabbidge & HR Singline & RSM Trust Limited, EA Pyke, FH Tong, BJ & HJ Walton & AN & DB Rountree	210, 222 & 230 Gleniti Road, and 5, 17 & 18 Snowdon Road, Timaru	210, 222 & 230 Gleniti Road, and 5, 17 & 18 Snowdon Road, Timaru (Lots 1, 2, 4 & 5 DP 425772, Lots 1 & 2 DP 445956, and Lot 2 DP 23372)	Residential (deferred)		<p>Additional detail.</p> <p>The submission seeks a ‘deferred residential zoning’ on the Rural Residential zoning to be uplifted in 1 January 2019 for eight (8) properties zoned Rural 1 with a combined area of some 10.5ha. The basis of the submission is that the GMS has not provided sufficient growth for the Rural Residential market, although the relief is residential zoning (appears to be largely a cut and paste from other submissions).</p> <p>The matters of relevance:</p> <p>The submitter requested properties be rezoned in accordance with the Rural Residential 'Gleniti North' Growth option, with a deferred Residential overlay being the 'Gleniti Road' Residential Growth option, with a deferred zoning commencement date of 1 January 2019 (i.e. immediately after the short-term 2013-2018 projection) for the following reasons:</p> <ul style="list-style-type: none"> - The predicted residential growth in Timaru artificially high and less land is needed for residential. - The predicted rural residential growth in Timaru artificially low and more land is needed for rural residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Districts beyond South Canterbury offering extensive options for greenfield residential and rural residential development. - The ease of servicing the land. - The land is close to existing settlement area. <p>Consideration:</p> <p>Assuming 10.5Ha is rezoned to residential, and at a density at 650m²/household, excluding 30% of the site for roads and stormwater would provide a maximum yield of some 70 – 100 households (removing existing dwellings and outdoor living areas).</p>



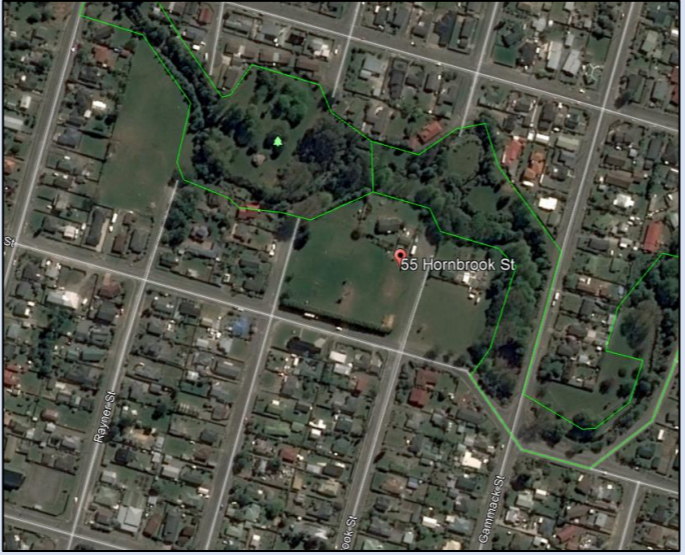
					<div data-bbox="828 184 1475 552"><p>Rezoning request in yellow</p></div>	<p>As outlined in Section 3.4 it is not considered that there is a shortfall of residential capacity in Timaru settlement to meet residential demand in the short and long term. Whilst there is peak in 2028 of demand for 588 household units, it is considered that this can be met subject to both existing (Dec 2016) capacity of 677 households, in conjunction with increased levels of intensification on existing residential sites within Timaru. Accordingly, if there is sufficient supply, this option is to be rejected as inconsistent to CRPS 5.2.1 and 5.3.1 given that these provisions seek to consolidate existing urban areas.</p> <p>The proposed relief would be consistent with those aspects of Policy 5.3.1 which seek that additional urban growth is attached to existing urban areas.</p> <p>Regardless, a deferment to 2019 is disingenuous given any potential would not be needed until the medium term (2028) if at all, and then if only to meet peak demand. By the time the replacement TDP Plan is operative it will be post 2019, hence relief is for a residential zone without deferment.</p> <p>Conclusion: Residential relief is likely to be inconsistent with CRPS 5.2.1 and 5.3.1 and consolidation approach, given NZS2017 projections (Property Economics, Attachment A, NZS2018 – 2048 projection). The Council’s Infrastructure Team have also advised that there are efficiency issues in terms of wastewater servicing, although water can be provided by extension to the Gleniti High Zone Urban main. Accordingly, compared to other residential sites examined in the options report, this site scored less well in terms of infrastructure efficiency, and is considered less appropriate in terms of CRPS Policy 5.3.2(3)(a) which seeks that land use integrates with:</p> <p><i>(a) The efficient and effective provision, maintenance or upgrade of infrastructure.</i></p> <p>However, if the Panel are of a view that residential demand is needed to meet residential demand, it is noted that this site scores well within the Options Report for Residential development options (pg 34) but did not make the short list further evaluated (pg 35).</p> <p>Recommendation: Reject relief and retain proposed rural residential rezoning.</p>
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Attachment E:5 – Residential Rezoning Requests Section 12

Attachment E:5 Residential Zoning Requests – Section 12


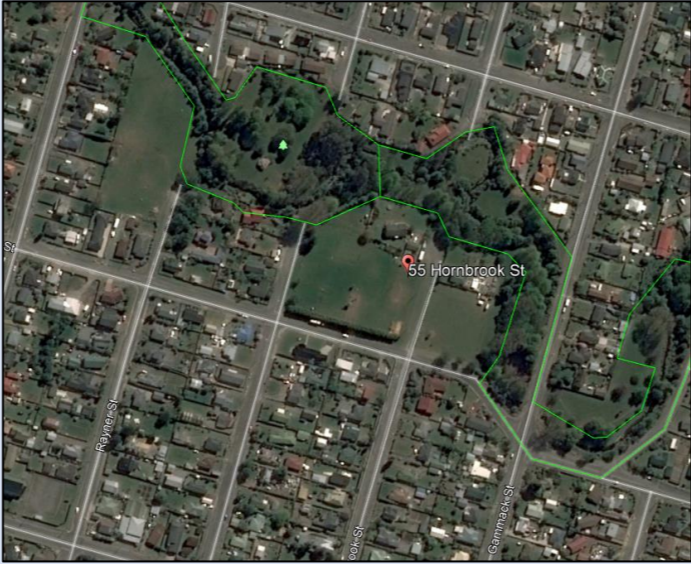

Sub No.	Name	Actual Address	Additional Rezoning Request Location	Requested New Zone	Photos	Additional Detail
1	S Wolczuk	50, 52 & 54 Hornbrook Street, Temuka	50, 52 & 54 Hornbrook Street, Temuka (Response to Q4)	Residential	<div></div>	<p>At a macro level relates to consolidation within the existing Temuka urban area. Surrounded on all sides by low density suburban residential development.</p> <p>At a micro level site is zoned Recreation 2 due to presenting an unacceptable risk from inundation and opposed by ECan. Adjoins reserve and stream system to the north and east. Noticeable drop in elevation towards stream.</p> <p>These sites are the subject of high levels of inundation and would be contrary to the CRPS approach as to avoiding development in high risk areas¹. The Canterbury Regional Council have advised that they will oppose any rezoning.</p> <p>CRPS Objective 11.2.1 and 11.3.1, 11.3.2 Seeks to ‘avoid’ new subdivision, use and development that increases risks associated with Natural Hazards. Approach would also be contrary to Strategic Direction [4] Building resilient communities which seeks to avoid development in high hazard areas where risk from natural hazards is assessed as unacceptable.</p> <p>Rezoning would be consistent with Objective 5.2.1 in terms of consolidation.</p> <p>Presumed services would be available given located surrounded by serviced urban area.</p> <p>Conclusion: Approach is inconsistent to CRPS 11.2.1 and 11.3.1. Rezoning to residential would not give effect to the RPS overall, despite consistency with consolidation approach.</p> <p>Recommendation: Reject rezoning</p>


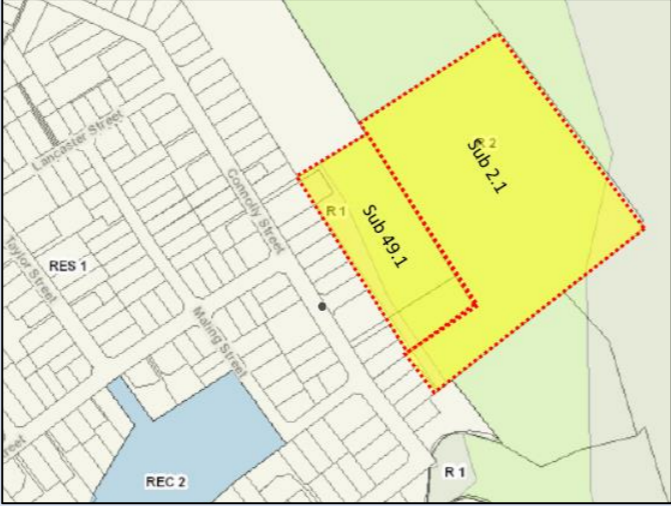
¹Environment Canterbury correspondence opposes any development.

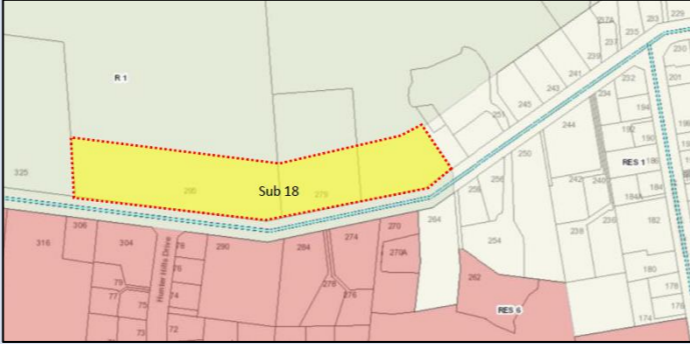


14	SD Barclay	56 Hornbrook Street, Temuka	Land adjacent to Hornbrook Street and Hayhurst Street, Temuka currently zoned Recreation	Residential	 	<p>At a macro level relates to consolidation within the existing Temuka urban area. Surrounded on all sides by low density suburban residential development.</p> <p>At a micro level site is zoned Recreation 2 due to presenting an unacceptable risk from inundation and opposed by Environment Canterbury. Adjoins reserve and stream system to the north and east. Noticeable drop in elevation towards stream.</p> <p>These sites are the subject of high levels of inundation and would be contrary to the CRPS approach as to avoiding development in high risk areas².</p> <p>CRPS Objective 11.2.1 and 11.3.1, 11.3.2 Seeks to ‘avoid’ new subdivision, use and development that increases risks associated with Natural Hazards. Approach would also be contrary to Strategic Direction [4] Building resilient communities which seeks to avoid development in high hazard areas where risk from natural hazards is assessed as unacceptable.</p> <p>Rezoning would be consistent with Objective 5.2.1 in terms of consolidation.</p> <p>Presumed services would be available given located surrounded by serviced urban area.</p> <p>Conclusion: Approach is contrary to CRPS 11.2.1 and 11.3.1. Rezoning to residential would not give effect to the RPS overall, despite consistency with consolidation approach.</p> <p>Recommendation: Reject rezoning</p>
19	C Wright	55 Hornbrook Street, Temuka	Land to the south of Taumatahahu Stream zoned recreation	Residential		<p>At a macro level relates to consolidation within the existing Temuka urban area. Surrounded on all sides by low density suburban residential development.</p> <p>At a micro level site is zoned Recreation 2 due to presenting an unacceptable risk from inundation and opposed by ECan. Adjoins reserve and stream system to the north and east. Dwelling located adjoining the steam, with noticeable drop in elevation to the southern portion of the site towards Alexandra Street.</p> <p>These sites are the subject of high levels of inundation and would be contrary to the CRPS approach as to avoiding development in high risk areas³.</p> <p>CRPS Objective 11.2.1 and 11.3.1, 11.3.2 Seeks to ‘avoid’ new subdivision, use and development that increases risks associated with Natural Hazards. Approach would also be contrary to Strategic Direction [4] Building resilient communities which seeks to avoid development in high hazard areas where risk from natural hazards is assessed as unacceptable.</p> <p>Rezoning would be consistent with Objective 5.2.1 in terms of consolidation.</p> <p>Presumed services would be available given located surrounded by serviced urban area.</p> <p>Conclusion: Approach is contrary to CRPS 11.2.1 and 11.3.1. Rezoning to residential would not give effect to the RPS overall, despite consistency with consolidation approach. Recommendation: Reject rezoning</p>

²Environment Canterbury correspondence opposes any development.

³Environment Canterbury correspondence opposes any development.

23	P Brown	55 Hayhurst Street, Temuka	Recreation land that borders the Tuamatakahu Stream	Residential	 	<p>At a macro level relates to consolidation within the existing Temuka urban area. Surrounded on all sides by low density suburban residential development.</p> <p>At a micro level site is zoned Recreation 2 due to presenting an unacceptable risk from inundation and opposed by ECan. Adjoins reserve and stream system to the north and east. Dwelling located adjoining the steam, with noticeable drop in elevation to the southern portion of the site towards Alexandra Street.</p> <p>The Canterbury Regional Council have advised that these sites are the subject of high levels of inundation and would be contrary to the CRPS approach as to avoiding development in high risk areas.</p> <p>CRPS Objective 11.2.1 and Policies 11.3.1, 11.3.2 seeks to ‘avoid’ new subdivision, use and development that increases risks associated with Natural Hazards. Approach would also be contrary to Strategic Direction [4] Building resilient communities which seeks to avoid development in high hazard areas where risk from natural hazards is assessed as unacceptable.</p> <p>Rezoning would be consistent with Objective 5.2.1 in terms of consolidation.</p> <p>Presumed services would be available given located surrounded by serviced urban area.</p> <p>Conclusion: Approach is contrary to CRPS 11.2.1 and 11.3.1. Rezoning to residential would not give effect to the RPS overall, despite consistency with consolidation approach.</p> <p>Recommendation: Reject rezoning</p>
2.1 and 49.1	L Burdon. McFarlane Family Trust	49, 63 and 73 Connolly Street.	Northern edge of Geraldine, adjoining McKenzie Lifestyle Village	Residential		<p>73 Connolly Street relates to some 9 hectares. Zoned Rural 2. Visually the site is depressed in terms of elevation, with a raised terrace towards Connolly Street. It is understood that the site is subject to inundation. Based on a 9ha developable area, and a density at 650m2, a yield of some 100 residential units could be anticipated.</p> <p>49 and 63 Connolly Street relates to some 2ha, zoned Rural 1 and Rural 2. Based on a 2ha developable area, and a density at 650m2, a yield of some 20 residential units could be anticipated.</p> <p>It is noted that the Connolly Street Options Assessment (pg 38) scored less well than Orari Station Road in terms of accessibility, inundation and the size of area.</p> <p>At a macro level, Submission 49 would be consistent with the consolidation of existing Geraldine urban area, and attached to the south by the existing Residential 1 zone, and to the west by the McKenzie Lifestyle (Retirement) Village. Accordingly, that submission alone would be consistent, on its face with those aspects of CRPS Objective 5.2.1 and Policy 5.3.1 that seek that urban expansions are attached to existing urban areas. Submission 2, or the rezoning of submissions 2 and 49 as a cohesive whole would not.</p> <p>Infrastructure: The Council’s Infrastructure Team advise no fatal issues. There is a wastewater network in close proximity, that stormwater would need to be accommodated on the site as the existing urban soakpit is at capacity. An ODP would be needed in terms of providing roading circulation and connection to Connolly Road.</p> <p>Natural Hazards:</p> <p>Chris Fauth from the Canterbury Regional Council has advised:</p>

					<div></div>	<div><ul style="list-style-type: none">• Sub 49, 49 and 63 Connolly Street:<ul style="list-style-type: none">- The area shown as “Sub 49.1” is largely expected to be clear of flooding from the Waihi River though small parts of this area could receive some shallow flooding in really extreme flood events.- This area is suitable for residential development and individual houses in the area either may not require any additional elevation of floor levels (other than Building Code minimums) or may require only modest additional elevation of the floors to meet the District Councils minimum floor level standard (subject to site inspection/more formal assessment).• Sub 2, 73 Connolly Street:<ul style="list-style-type: none">- The flood risk to this block of land is far more complex- Most of the area will be prone to some flooding in major flood events from upstream breakouts from the Waihi River.- Flood depths will vary across the property as there are significant variations in ground level. Generally, flood depths will be higher closer to Raukapuka Stream and the east boundary of the property- In the 100 year Average Recurrence Interval (ARI) flood depths over all of the property are expected to be in the 0 – 500 mm range with the deepest flooding near the stream or in other low areas or swales.- In the 500 year ARI flood event, depths over the much of the property are still expected to be up to 500 mm however, for the roughly third or so of the property closest to the stream (eastern third) and in any other significant low areas depths may be in the 0.5 – 1 metre range.- None of the property (excluding perhaps some small, localised depressions or areas immediately adjacent to the stream) is likely to be floodable to the extent where it would be defined as “high hazard”. However, despite this fact there will be parts of the property where depths will be significant in extreme flood events. The areas closer to the creek and other lower areas will have several potential negative aspects if developed down to 600 m² lots:<ul style="list-style-type: none">○ Significant elevation of floor levels will be required (maybe in the 600 – 900 mm range) to meet District Plan requirements○ Egress will be difficult and potentially dangerous during extreme flood events○ High density development and the presence of buildings, fences, raised gardens etc have potential to block or slow the path of flooding further increasing potential flood depths in the area○ These lower areas have the potential to be flooded slightly more frequently than the rest of the property and may also be more prone to any potential local runoff flooding that may affect the area.- A strip of land, closer to Raukapuka Stream, may be prone to higher flood depths, in-office information (Orari Waihi Temuka Flood Study) suggests a significant width (maybe 80 m) where depths will be greater than 0.5 m in extreme floods</div> <div><p>In summary for 73 Connolly Street (Sub 2.1).</p><ul style="list-style-type: none">- The majority of this area is floodable but approximately two thirds of it could be suited to residential development with moderate floor level elevations (less than 500 mm above ground) likely to be required to meet District Plan requirements.- The other third (roughly) of the property, including areas closer to the creek and other isolated swales and low areas will be affected by deeper flooding. This flooding is unlikely to reach high hazard criteria but is still substantial.</div> <div><p>Accordingly, Orari Station Road remains recommended as the primary option for Residential rezoning in the GMS.</p><p>For submission 2, the proposal is considered to be inconsistent with CRPS Objective 11.2.1 seeks to ‘avoid’ new subdivision, use and development that increases risks associated with Natural Hazards. The approach would also be contrary to Strategic Direction [4] Building resilient communities which seeks to avoid development in high hazard areas</p></div>
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						<p>where risk from natural hazards is assessed as unacceptable.</p> <p>Only rezoning Submission 49 would be consistent with Objective 5.2.1 in terms of consolidation.</p> <p>In conclusion: Rezoning either Submission 2, or Submission 2 and 49 is inconsistent to CRPS 11.2.1 and with a total yield of 120 households would be less appropriate with consolidation approach sought in Objective 5.2.1. However, Submission 49 on its own appears to not be affected by inundation, and given its modest size would not be inconsistent with Objective 5.2.1.</p> <p>Accordingly, submission 2 is recommended to be rejected. Submission 49 is finely balanced and its merits are noted but is recommended be rejected on the basis of provision of Orari Station Road.</p>
18	Rolling Ridges Trust, Russel & Pages Trust, Simstra Family Trust	239, 279 & 295 Pages Road, Gleniti, Timaru	Lot 3 DP 397906 and 279 & 295 Pages Road, Timaru. Note: 50 metre strip along Pages Road.	Residential	  	<p>Site is located on northern extent of Pages Road (zoned Rural 1). Urban boundary largely stops at Pages Road (Residential 6, refer photo), although small strip terminates at 251 Pages Road. Area has a rural residential and rural character (further north, refer photo). No ability to demarcate urban boundary if residential boundary is extended. Site sizes range from 0.8ha to 10.25ha. A modest residential yield would be expected, and proliferation of RoWs onto Pages Road to gain access.</p> <p>At macro level the site does not lend itself to residential extension as there is no clear topographical or geographic boundary to delineate the end point of the zone. The site has predominantly a rural residential (and rural further north) character and considered appropriate for Rural Residential development in the Growth Options assessment (Kellands Hill, g28, 34). Scores poorly in terms of sewer and stormwater. Approach would be inconsistent with Policy 5.3.6 (provisions of services) and 5.3.1 in that the site would not promote a co-ordinated pattern of development.</p> <p>At a micro level, the area is not characterised by residential amenity and character.</p> <p>Conclusion: Approach is less appropriate with CRPS Policy 5.3.1 and consolidation approach. Would create expectation of residential rezoning with other similar sites.</p> <p>Recommendation: Reject rezoning, and retain Rural Residential.</p>

39	P & L Bartrum	4-8 Rayner Street, Pleasant Point	4-8 Rayner Street, Pleasant Point	Residential	<div></div>	<p>Submission seeks rezoning to Residential from State Highway to German Creek, and access would be available from Smart Munro Road.</p> <p>Growth projections for Pleasant Point can be met through existing capacity. This option would be expensive to service. Options for servicing for sewer and stormwater effectively render development, based on a slow uptake of allotments prohibitive. Residential would provide a defensible urban boundary to the south at German Creek, but not to the east. The frontage with SH8 already has a residential character, area to the south is rural in character.</p> <p>At a macro level additional growth is not required and hence would be less appropriate with consolidation approach in CRP5.2.1, site is also difficult to service efficiently given likely demand uptake (inconsistent with CRPS 5.3.5 which seeks efficient servicing for development, including sewer and water), and would not result in a defensible urban boundary.</p> <p>At a micro level, already contains residential character towards frontage adjoining Kabul Street. Some surface ponding apparent.</p> <p>Conclusion: Approach is inconsistent with CRPS 5.2.1, 5.3.1 and potential contrary to 5.3.5 given expense to service.</p> <p>Recommendation: Retain rural zoning.</p>
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Attachment F – Infrastructure Assessments

Key Assumptions:																	
1	That Rural Residential allotments are serviced with reticulated wastewater and water BUT NOT STORMWATER																
2	That Rural Residential allotments are NOT serviced with fire fighting capable mains																
3	That Rural Residential allotments water supply are restricted scheme																
STATUS	Site Name / Submitter	Site Location	Proposal / Request	Submission #	Wastewater		Stormwater		Water		Transport		Power and Comms	Other	Estimated Total Costs		Recommendation
					Comments	Network Costs	Comments	Network Costs	Comments	Network Costs	Comments	Network Costs			Network Costs	Total	
	Existing GMS Sites																
	Geraldine Residential	Orari Station Road - see Options Assessment Report (#1057595) p.32	Proposed Residential and deferred residential		There is network close by.	Nil	Definitely required - treatment and attenuation. Property developer will own the infrastructure and consent. If there is public road, very likely the consent will be transferred to TDC and therefore must ensure s/w treatment and attenuation is at high requirement to minimise liability to TDC not able to met the consent requirement.	ROC = \$10k-50k legal and professional service to assist TDC	There is network close by.	Network Upgrade and Extension = \$100k-200k	Requires active transport link across Waihi River to Talbot Street.		Requires Alpine Energy input				Consider further. Requires an ODP pre development.

w	Geraldine Industrial	841 Winchester-Geraldine Road / "Tiplady Road" - see Options Assessment Report (#1057595) p.50	Proposed Industrial L		Pump, storage and discharge management will be required to be implemented to mitigate sewage overflow at the bottom of Geraldine network. Network extension to connect to the existing network is required. Onsite disposal has a high area requirement. Not best use.	ROC = \$10k-20k professional service to assist TDC	Definitely required - treatment and attenuation. Property developer will own the infrastructure and consent. If there is public road, very likely the consent will be transferred to TDC and therefore must ensure s/w treatment and attenuation is at high requirement to minimise liability to TDC not able to met the consent requirement.	ROC = \$10k-50k legal and professional service to assist TDC	Depend on the demand and fire fighting building standards and will struggle to meet the fire fighting requirement. Booster pump, fire fighting storage, network upgrade or combination of both options to improve an acceptable fire fighting capability.	ROC = \$10k-20k professional service to assist TDC	Depending on density of development, an intersection access point would be required. No new access to HW	None anticipated.	Requires Alpine Energy input				Serviceable but requires consideration.
	Timaru Intensification priority areas	See Options Assessment Report (#1057595) p.29	Proposed Neighbourhood Intensification Priority Areas		There is network close by.	Nil	There is network close by, Case by Case basis for the Quantity. If there is flooding downstream then attenuation is required. Quality will be required if it is more than 5 lots using ROW.	Nil	There is network close by.	Nil							Consider further. Onsite attenuation to predevelopment required. What is the proposed density (greater than 350m ² ?) and exactly where is it?
	Geraldine Intensification priority areas	See Draft Growth Management Strategy (#1055939) p.14	Proposed Neighbourhood Intensification Priority Areas		There is network close by.	Nil	There is network close by, attenuation is required. Quality will be required if it is more than 5 lots using ROW.	Nil	There is network close by.	Nil							Consider further. Onsite attenuation to predevelopment required. What is the proposed density and exactly where is it?

w	Timaru - Gleniti North Rural Residential	Gleniti North Timaru - see Options Assessment Report (#1057595) p.10	Proposed Rural Residential		Majority will be Pump System to discharge into Gleniti Rd Sewermain. Some area can be in Gravity Feed which is feasible to those land closer to Gleniti Road. Onsite storage.	ROC Network Extension = \$150k-300k, ROC Network Upgrade = \$200k-300k	Property developer will own the infrastructure and consent. If there is public road, very likely the consent will be given to TDC and therefore must ensure s/w treatment and attenuation is at high requirement to minimise liability to TDC not able to met the consent requirement.	ROC = \$10k-50k legal and professional service to assist TDC	Can be serviced thru Downlands Hadlow Rural Scheme or Gleniti High Zone Urban main.	ROC possible pump and booster pump upgrade required = \$20-50k, Reticulation Upgrade (Downlands) = \$100k-150k	Poor linkages with network. Very limited potential for new connection points.	Requires mechanism to upgrade Gleniti Rd frontage	Requires Alpine Energy input	Already highly fragmented ownership. Estimate 6 - 8 additional lots if min is 1 Ha At min 5000m2 around 14 additional lots Very poor yield			Do not consider further. Potential yield insufficient to make infrastructure viable
w	Timaru - Kelland's Heights Rural Residential	Kelland's Heights Timaru - see Options Assessment Report (#1057595) p.10	Proposed Rural Residential		Combination of gravity and pump system (Further away from Pages Road). It will be in Waimataitai Catchment and possible sewermain upgrade will be required. On site storage.	ROC Network Extension = \$500k-1M, ROC Waimataitai Sewermain upgrade - \$250k - 500k	Onsite Attenuation and Treatment will be required because it will be discharging into Taitarakihi Creek. Consent is very likely to be pass to Council to manage.	ROC = \$10k-50k professional service to assist TDC	Can be serviced thru Downlands Hadlow Rural Scheme or Gleniti High Zone Urban main.	ROC possible pump and booster pump upgrade required = \$20-50k, Reticulation Upgrade (Downlands) = \$200k-400k	Most likely to be serviced by ROW's. No additional access points onto Kellands Hill Rd would be acceptable. ODP over Tavers / Gresson / Stray blocks required.	Requires mechanism to upgrade Pages Rd frontage	Requires Alpine Energy input	At 8,000 to 10,000m2 could yield 35 lots. Increasing density would increase yield and reduce per allotment infrastructure costs			Consider further. Once servicing expectations and allotments size confirmed, undertake conceptual servicing layout and costing allocations. Note this will effectively result in existing residential areas being ring fenced by rural res.
	Timaru - Elloughton South Rural Residential	Elloughton South Timaru - see Options Assessment Report p.10 & Draft Growth Management Strategy p.12	Proposed Rural Residential		It will need to be pump system into TDC reticulation. There will be a main to cross												Not considered. Proposed Residential.
	Temuka - Thompson Rural Residential	Thompson Road Temuka - see Options Assessment Report (#1057595) p.12	Proposed Rural Residential		Majority of this area can only be serviced by Pump System. Many multiple landowners that may put TDC to extend the sewermain for this type of	ROC pump sewermain extension = \$130k to \$250k	The development will need to attenuate and dispose on site.	Nil	Can be service. Water network Extension is required. Many multiple landowners that may put TDC to extend the sewermain for this type of development and recover through contribution	ROC network extension = \$150K to \$300k	Most likely to be serviced by ROWs. Thompsons Road and Grange Settlement Road require upgrade.	\$300k	Requires Alpine Energy input				Only consider further if servicing confirmed. Potential yield maybe insufficient to make infrastructure viable

					development and recover through contribution												
	Temuka - Guild Rural Residential	Richard Pearse Drive Temuka - see Options Assessment Report (#1057595) p.12	Proposed Rural Residential		Majority of this area can only be serviced by Pump System. Developer to extend the network.	ROC pump sewermain extension = \$150k to \$250k	The development will need to attenuate and dispose on site.	Nil	Can be service. Water network Extension is required. Developer to extend the network.	Nil	Most likely to be serviced by ROWs.		Requires Alpine Energy input				Requires further consideration Potentially very limited yield
w	Geraldine - Main North East Rural Residential	Main North Road, Geraldine - see Draft Growth Management Strategy (#1055939) p.14	Proposed Rural Residential		Pump station will be required for discharge management and pumping into the network. The site network can build as gravity feed into the pump station.	ROC Pump Station = \$500k - 1M, ROC Network Extension = \$700k - 1.2M	Channel upgrade is required for additional discharge especially for big events. (this is NZTA asset), Low event could get away with private soak pit	ROC channel upgrade = 50k -150k, ROC s/w road treatment = \$200-300k	Network will need to be extended and booster pump is required to provide fire fighting capabilities. There is pipe upgrade required in the network for this additional demand	ROC Booster Pump - \$30k-50k (with FF), ROC Network Upgrade = \$150k-300k, ROC Network Extension = \$300-400k	Additional accesses onto the SH. NZTA consulted?		Requires Alpine Energy input	Highly fragmented small block ownership. Estimate 4 additional lots if min is 1 Ha. Extremely poor yield			Requires targeted consultation. Need NZTA, Ecan and Alpine collaboration. Limited yield.
w	Geraldine - Templer Street Rural Residential Deferred	Templer Street, Geraldine - see Draft Growth Management Strategy (#1055939) p.14	Proposed Deferred Rural Residential		Pump station will be required for discharge management and pumping into the network. The site network can build as gravity feed into the pump station.	ROC Pump Station = \$500k - 1M, ROC Network Extension = \$1M - 1.4M	Treatment is required for the increase traffic for the road, Low event could get away with private soak pit	ROC s/w road treatment = \$200k-300k	Network will need to be extended and booster pump is required to provide fire fighting capabilities. There is pipe upgrade required in the network for this additional demand	ROC Booster Pump - \$30k-50k (with FF), ROC Network Upgrade = \$150k-300k, ROC Network Extension = \$400k-600k	Upgrade of Templer St for full length. All intensification via ROW's	\$250k - \$300k	Requires Alpine Energy input	Appears to be productive horticultural land?			Requires targeted consultation. As above. Once servicing expectations, allotments size confirmed and stormwater solution proposed, undertake conceptual servicing layout and costing allocations.
	Pleasant Point - Manse Road Rural Residential	Manse Road, Pleasant Point - see Draft Growth Management Strategy (#1055939) p.15	Proposed Rural Residential		Sewer network and pump station storage upgrade and is required and possible flow management is required to prevent overflows due to the topography. ODP is required for	ROC network and PS upgrade = \$1.5M to \$3M,	The development will need to attenuate and dispose on site.	Nil	May need booster pump to ensure pipe at the high zone don't get negative pressure during fire fighting demand. TDC will need to install a booster pump since there is benefits to Pleasant Point.	ROC Booster Pump = \$250k to \$400k							Do not consider further. High servicing costs.

					this and will be dealt by the developer.												
	New Sites Proposed by Council																
w	Timaru - Coonoor Road	see Options Assessment Report (#1057595) p.31	Proposed Residential		There is public sewer main in vicinity. Can be service easily without much need of TDC to do the extensions for development.	ROC = \$5k proffesional service	New discharge to Otupua Creek. Treatment and Attenuation is required. Consent is more likely to pass to Council to manage	ROC = \$10k-50k legal and proffesional service to assist TDC	Water can be service to this development	ROC = \$5k proffesional service	ODP required to create through road with adjacted Res zoned land and O'Neill Place						Consider further.
w	Timaru - Taitarakihi	see Options Assessment Report (#1057595) p.30	Proposed Residential		Discharge either to Blair St or Ascot Street. If Ascot Street may need sewermain upgrade	ROC = \$10k-30k professional service to assist TDC, ROC Reticulation Upgrade in Ascot = \$250k - 350k	Attenuation and Treatment will be required because it will be discharging into Taitarakihi Creek. ODP is essential to manage this. Consent is very likely to be pass to Council to manage.	ROC = \$10k-50k legal and professional service to assist TDC	Water Extension required but will be at developer cost (1 land owner)	ROC = \$10k professional service to assist TDC	Limited access points. ODP required.		Requires Alpine Energy input	Consultation with landowner / agent ? Due to topography, relatively low yield. Requires detailed investigation and costing.			Consider further. Requires staging and ODP. Undertake consultation with Transpower and landowner. PDP has looked at stormwater.
	Timaru - Aorangi Road	31 & 57 Aorangi Road	Proposed Industrial H		Sewer Network Extension is required in WIEZ. Can provide domestic and tradewaste service. Extension to be developer cost (?)	ROC = \$10k proffesional service	Definitely required - treatment and attenuation. The consent will be transfered to TDC and therefore must ensure s/w treatment and attenuation is at high requirement to minimise liability to TDC not able to met the consent requirement.	ROC = \$10k-50k legal and proffesional service to assist TDC	Water Network Extension required in WIEZ.	???	Would increase return in TDC's upgrade investments on Meadows and Aorangi Rd	n/a	Requires Alpine Energy input				Consider further. Undertake conceptual servicing layout and costing allocations. Would have to be subject to ODP.

							Discharge into Aorangi drain.										
	Submitter Proposed Sites																
	Majors Development Limited	Majors Road and 1 McKechnie Street	Industrial L request	47	There is network close by.	Nil	Stormwater Treatment and Attenuation will be required.	Nil	There is network close by. This is only providing 25l/s FF.	Nil	Would require widening of Majors Rd and formation of McKechnie St. Insufficient yield to justify this expense.			McKechnie St formation an LTP project?			Consider further. Also reconsider Kennedy and Majors Rd areas in Options report.
	A McCleary, and G & M Ladbrook	Corner Meadows Road and Aorangi Road, Washdyke	Industrial request	66	Sewer Network Extension is required in WIEZ. Can provide domestic and tradewaste service. Extension to be developer cost (?)	ROC = \$10k proffesional service	Definitely required - treatment and attenuation. Discharge into Aorangi drain. Development to deal on site prior to discharge.	ROC = \$5k proffesional service	Water Network Extension required in WIEZ.	???	Would increase return in TDC's upgrade investments on Meadows and Aorangi Rd	n/a	Requires Alpine Energy input				Consider further. Undertake conceptual servicing layout and costing allocations. Would have to be subject to ODP.
	LP & JA Moodie	236 Meadows Road, Washdyke	Industrial request	67	Sewer Network Extension is required in WIEZ. Can provide domestic and tradewaste service. Extension to be developer cost (?)	ROC = \$10k proffesional service	Definitely required - treatment and attenuation. The consent will be transfered to TDC and therefore must ensure s/w treatment and attenuation is at high requirement to minimise liability to TDC not able to met the consent requirement. Discharge into Aorangi drain.	ROC = \$10k-50k legal and proffesional service to assist TDC	Water Network Extension required in WIEZ.	???	Would increase return in TDC's upgrade investments on Meadows and Aorangi Rd	n/a	Requires Alpine Energy input				Consider further. Undertake conceptual servicing layout and costing allocations. Would have to be subject to ODP.

	L Burdon	73 Connolly Street, Geraldine	Residential request	2	There is network close by.	Nil	TDC existing infrastructure is soakpit and will not cater to the additional flow from this development, therefore Treatment and Attenuation is required on the development.	Nil	There is network close by.	Raukapuka Watermain upgrade - \$100k - \$200k	Submission assessed as one as adjoining properties. Would require ODP to ensure loop road or cul de sac for circulation and access		Requires Alpine Energy input				Consider further. Precursor to rezoning would be a landowner initiated ODP
	McFarlane Family Trust	49 & 63 Connolly Street, Geraldine	Residential request	49													
	Riverside Estate (2008) Limited, and DE Ngaha & JM Hammond	9 Grant Street and Lot 2 DP 387529 on Grant Street, Temuka	Currently zoned Residential Deferred. Request to uplift the deferred status	65													Do not consider further. This is an DPR / IS issue.
w	Seadown Properties Limited	Washdyke Flat Road, Timaru	Industrial L request	24	Sewer can be service to this development	Nil	Attenuation and Treatment will be required because it will be discharging into Washdyke Creek using TDC existing discharge	ROC = \$10k-50k professional service to assist TDC	Water can be service to this development	Nil	Washdyke Flat already in process of being upgraded so will have excess capacity which would accommodate this.	Already incurred					Consider further. Precursor to rezoning could possibly be a landowner initiated ODP. Further analysis to consider likely allotment size and development layout to determine need for through road.
w	SM Fraser, AJ Shaw and PA Johnston	45 Washdyke Flat Road, Washdyke		48	Sewer can be service to this development	Nil	Attenuation and Treatment will be required because it will be discharging into Washdyke Creek using TDC existing discharge	ROC = \$10k-50k professional service to assist TDC	Water can be service to this development	Nil	Could possible benefit from being a through loop road to maximise benefit for both properties.						
	GW & DS Craig & MWS Clark, KW & SM Pyke, GA & SA Morton & Woolcombe Trustees 2 Limited, GA & SA Morton, JR & JJ Ford, and PG & JA Wilkins & GJA Proudfoot	Pages Road and Kellands Hill Road	Rural Residential	61	It will be serviced by Pump System. It will be in Waimataitai Catchment and possible sewermain upgrade will be required. On site storage. Comment similar to Kelland's Heights Rural Residential	It is covered in Kellands Height Rural Residential ROC.	Onsite Attenuation and Treatment will be required because it will be discharging into Taitarakihi Creek. Consents is very likely to be pass to Council to manage.	It is covered in Kellands Height Rural Residential ROC.	Can be serviced thru Downlands Hadlow Rural Scheme or Gleniti High Zone Urban main.	It is covered in Kellands Height Rural Residential ROC.	See comments for Kellands Heights Rural Res above. Northern extent of proposed area would require additional roading network which is uneconomic.						Do not consider further. Require more certainty on proposed allotment sizes.

	A White	120 Cox Street, Geraldine	Rural Residential	30	Sewer can be service to this development. This is deferred RR therefore not considering it.	Nil	Stormwater Treatment and Attenuation will be required. This is deferred RR therefore not considering it.	Nil	Developer to extend water network. This is deferred RR therefore not considering it.	Nil	Requires consultation with NZTA. No local road network.						Do not consider further.
	RP & PB Simmons Trustee Co Limited	29 Oakwood Road, Timaru	Rural Residential	36	It will be serviced by Pump System. It will be in Waimataitai Catchment and possible sewermain upgrade will be required. On site storage. Comment similat to Kelland's Heights Rural Residential	It is covered in Kellands Height Rural Residential ROC.	Onsite Attenuation and Treatment will be required because it will be discharging into Taitarakihi Creek. Consent is very likely to be pass to Council to manage.	It is covered in Kellands Height Rural Residential ROC.	Can be serviced thru Downlands Hadlow Rural Scheme or Gleniti High Zone Urban main.	It is covered in Kellands Height Rural Residential ROC.	Unlikely to require additional roading. Considered as part of Kellands Rural Res Area?						Requires further discussion. Include in Kellands RR and include surrounding blocks?
	Timaru District Holdings Limited	Showgrounds Hill, Evans Street, Timaru	Include provision for IND L	5										No distinguishable difference from existing zoning			Consider further.
	Harvey Norman Properties (NZ) Ltd	226 Evans Street, Timaru	Commercial	57	Sewer can be service to this development	Nil	Onsite Attenuation and Treatment will be required because it will be discharging into Taitarakihi Creek. Possible network upgrade downstream(?)	ROC network upgrade = \$150k-\$300k	Water can be service to this development	Nil	Consultation with NZTA?						
	Rolling Ridges Trust, Russel and Pages Trust, and Simstra Family Trust	Pages Rd, Gleniti	Residential request	18	Sewer network extension is required by the developer	Nil	Onsite Attenuation and Treatment will be required private and roading upgrade (from swale to k&C) component in that area. Developer to be responsible for this upgrade cost	ROC Attenuation an Treatment upgrade = \$75K to \$150K	Water can be service to this development	Nil	Could easily be serviced with ROW's. Would require frontage upgrades.						Consider further. Eases financial burden on upstream RR
	Port Bryon Property Ltd	16 - 18 Hilton Hwy	?	51	New sewerline is required to service this area. Should	ROC Network Extension = \$250K to \$500K	Onsite Attenuation and Treatment will be required.	Nil	Water can be service to this development	Nil	Consultation with NZTA?						

					be with conjunction with Brough Gully ODP.												
	Bartrum			39	Network upgrade is required and possible PS upgrade. Extension to be developer cost.	ROC network upgrade = \$1M to \$2M	Onsite Attenuation and Treatment will be required private and roading upgrade (from swale to k&c) component in that area. Developer to be responsible for this upgrade cost.	ROC Attenuation an Treatment upgrade = \$150K to \$300K	Water can be service to this development. There may be some areas have lower pressure during FF requirement. Extension to be developer cost.	Nil							As per GMS options report