

Memorandum

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Attention: Matt Bonis

Company: on behalf of Timaru District Council

Date: 29/05/2025

From: Yvonne Pflüger, Partner, Landscape Planner

Message Ref: Response to Submission Packages received by TDC on Growth Chapter (as related to landscape matters) Final version

Project No: BM240365

Qualification and Experience

My name is Yvonne Pflüger. I am employed as a Landscape Planner for Boffa Miskell Limited (BML), an environmental consultancy specialising in planning, design and ecology. I am a Partner in the company.

I hold a Master's degree in Landscape Planning from BOKU University, Vienna (Austria, 2001) and a Master's degree in Natural Resources Management and Ecological Engineering from Lincoln University (NZ, 2005). I am a Full Member of the Resource Management Law Association and a registered member of the New Zealand Institute of Landscape Architects, as well as a Certified Environmental Practitioner under the Environment Institute of Australia and New Zealand.

I have practised as a landscape planner for over 23 years on a wide range of projects including landscape and visual effects assessments. During my time at BML I have played a key role in preparing numerous landscape studies for various territorial authorities throughout New Zealand's South Island. I was the project manager and key author of the Canterbury Regional Landscape Study Review (2010) and Banks Peninsula, Ashburton, Invercargill, Hurunui, Christchurch, Timaru, Kaikoura, Eastern Mackenzie, Waimate and Southland District landscape studies (2009-2022). The preparation of these studies, and of related evidence for hearings, involved evaluating landscape character and values for these regions and districts and advising councils on objectives and policies for the ongoing management of the landscape.

I have also prepared a large number of landscape and visual assessments for development projects of varying scales within sensitive environments, including preparation of landscape evidence for numerous council and Environment Court hearings.

Through my work on the Timaru Landscape and Coastal Study in 2017, as well as my advice provided in relation to community engagement in 2021, I am familiar with the landscapes within the district. I visited the Timaru District for the preparation of these studies. As part of my site

investigations, I also had the opportunity to observe developments and their effects within the landscape over the past 10 years.

For the preparation of this response to submissions on the Growth Chapter of the District Plan, I visited the relevant sites covered in this memorandum on 29/04/2025, accompanied by Mr Hakkaart (TDC).

Code of Conduct for Expert Witnesses

I confirm I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Background

In 2016 Timaru District Council (TDC) engaged Boffa Miskell Ltd (BML) to assist in assessing the landscape values and identifying areas of Outstanding Natural Features and Landscapes (ONF/Ls) within the District, as well as assessing the extent and natural character of the coastal environment. Subsequently, the Timaru Landscape and Coastal Study (Boffa Miskell, 2020- referred to as the BML Study) was prepared to ensure that Outstanding Natural Features and Landscapes, as well as Visual Amenity Landscapes (VAL), proposed in the District Plan are consistent with each other in terms of their value and boundary identification. The draft version of this study was used to inform landowner consultation and stakeholder engagement in 2021, which resulted in additional site visits and some amendments. Maps used for notification of the District Plan Review (DPR) reflected these amendments.

In 2025, BML were asked to assist with the response to submissions on the Natural Features and Landscapes (NFL) Chapter, the Coastal Environment (CE) Chapter and Energy and Infrastructure Chapter (as it relates to the CE) as part of the DPR process.

Growth Chapter

TDC sought assistance from BML to assess information provided by submitters in relation to re-zoning requests which are the subject of Hearing G – Growth. This memorandum outlines the responses to the submissions packages received from submitters in relation to the Growth Chapter/ Future Development Area (FDA), in relation to which landscape matters are relevant. The expert opinions set out in this memorandum comprise technical input to inform the preparation of the S42A report prepared by Mr Bonis (PLANZ).

TDC has received 45 submissions (and 19 submitter information packages) relating to the Growth topic (Hearing G). These have sought either:

- An urban (residential or industrial) rezoning;
- A rural lifestyle rezoning (site size 5,000m² with reticulation or 2ha without); and / or
- Changes to the timing of and / or extension to a Scheduled FDA.

Where technical expert material has been provided by the submitter, it was peer reviewed for the preparation of this report. However, in the majority of cases, no technical expert material has been provided. Where no technical material was provided (or only a planning assessment), a brief commentary on the suitability of the proposal in light of the information available is included in relation to potential landscape issues arising. If there is insufficient information to enable an assessment, this is stated. The considerations are provided in Attachment A,

For the preparation of this report, TDC requested me to:

- Where the submitter information package has provided technical landscape and natural character information, identify whether that is sufficient to enable a recommendation to be made or whether there are gaps in that information, and undertake a review of that information in order to inform a planning recommendation;
- Where no technical information is provided, provide brief commentary on the landscape and natural character matters and whether further information is required to inform a recommendation;

Landscape and natural character considerations for rezonings may include considerations of character, amenity, density sought in the request, and provision of clear defensible edges as associated with the rezoning / FDA request.

Attachment A: Response to Growth Submission Packages received by TDC

The purpose of this attachment is to provide a landscape assessment responding to those submission packages provided to the Timaru District Council in reply to the requests set out in the Section 42A Hearing G – Growth Preliminary Report, dated 29 October 2024¹ (**Preliminary Report**).

The submission packages support submissions that seek rezoning of land, the expansion or introduction of Future Development Areas (**FDAs**), or a change in sequencing associated with Future Development Areas (**FDAs**).

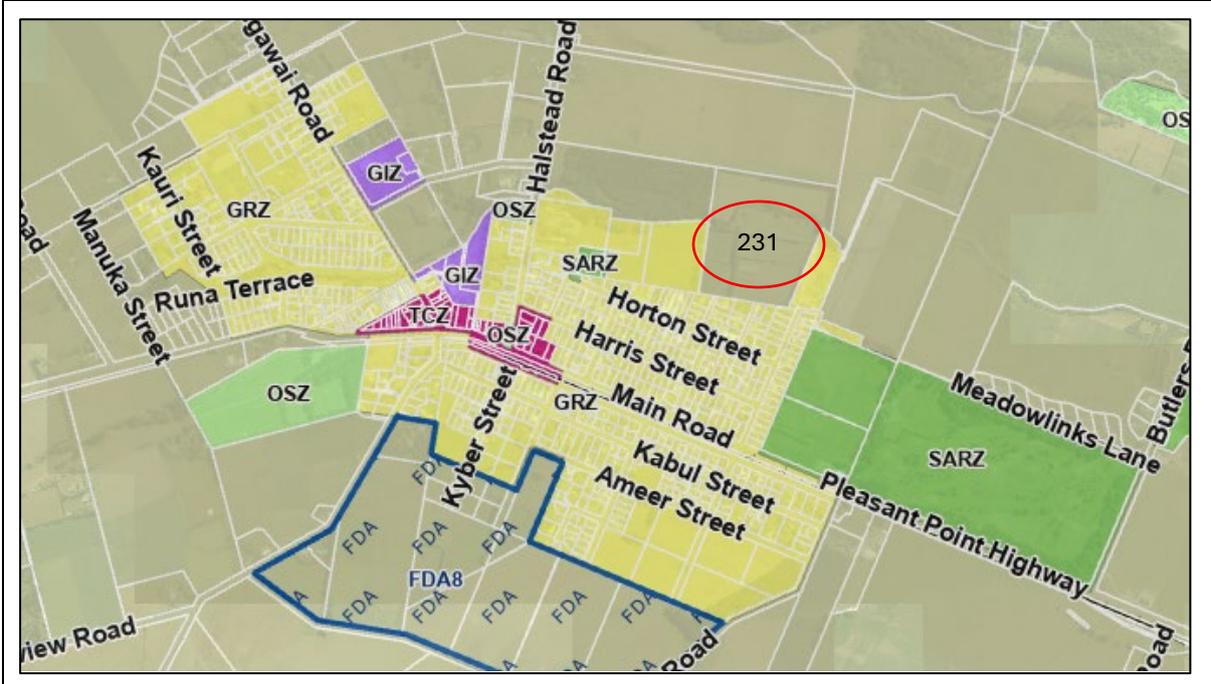
Analysis is also provided in response to those submissions from Waka Kotahi NZ Transport Agency [143.193] and the Canterbury Regional Council [183.166] where those submissions have requested removal of specific FDAs.

The attachment has grouped submissions by locations for ease of reference.

Pleasant Point

Only one submission package has been received in relation to Pleasant Point.

Sub No.	Submitter	Address
231	T Blackler	10 Burke Street, Pleasant Point



¹ https://www.timaru.govt.nz/_data/assets/pdf_file/0007/945511/TDC-Rezonings-Preliminary-Report-v3-Final.pdf

Sub: 231	T Blackler	10 Burke Street, Pleasant Point
<p>Submission and location:</p>	<p>Site size is 10.6ha.</p> <p>The submitter seeks to rezone the property at 10 Burke Street, Pleasant Point to a mix of General Rural or Open Space and General Residential.</p> <p>The submission package references provision of a residential care facility on the site, and that the two adjoining properties are residential in nature.</p> <p>The package includes a 'concept plan' for a range of retirement units and aged care facilities in the southern portion of the site, with no residential buildings proposed to be located to the north of the stream that intersects the site. There is no mechanism tying this to the rezoning sought in the submission.</p>	
<p>Comment:</p>	<p>No technical landscape information was provided in support of this request.</p> <p>The site contains Pleasant Point Stream with vegetation along the margins, is subject to esplanade reserve requirements as notated in the TPDP, and is lined by a stand of mature trees. Shelter belts are also present on the site, with the balance of the site in arable use.</p> <p>The submission package is based on a retirement village development on the southern side of the stream, filling a gap between existing residential zoning to the west, east and south. However, I acknowledge that submission is for a GRZ and there is no mechanism that would ensure delivery of such a residential complex. The proposed residential zone (potentially developed into retirement village) would provide infill development between existing zoning.</p> <p>In my view, this would be acceptable from a landscape perspective, as long as the stream is maintained as a landform boundary for development and setbacks from the waterway are maintained for natural character reasons. The amenity of the site is high and good design outcomes could be achieved if developed sensitively. However, the natural characteristics associated with a river corridor need to be protected, with the potential for wider integration with a blue/green corridor network. Should substantial earthworks be required in light of potential flood risk associated with the area, the effects on landscape, visual and natural character values of the site and Pleasant Point Stream would need to be managed carefully.</p>	

Temuka

Three submission packages have been received in relation to Temuka.

Sub No.	Submitter	Address
34	Greenfield, McCutchen, Tarrant, Sullivan, Ellery	31 Factory Road, 14,25, 28 and 55 Grange Settlement Road / FDA7
145	T Johnson	340 King Street
237	Aitken, Johnston and RSM Trust	26 and 52 Factory Road / FDA6



34	McCutchen, Tarrant, Sullivan, Ellery	31 Factory Road, 14,25, 28 and 55 Grange Settlement Road / FDA7
Submission and location:	<p>Site size is 40.5ha.</p> <p>The site is zoned GRUZ, with an accompanying FDA7 overlay as identified in SCHED15 for Rural Lifestyle Zone and a Priority area – 2-year DAP.</p> <p>The submission supports notified TPDP provision associated with FDA7 and states in the submission [13]:</p> <p><i>“Support for FDA7 Thompson Road Future Development Areas and the associated 2-year priority”</i> (as identified in SCHED15).</p>	

Comment:	Proposed FDA7 lies adjacent to the Temuka General Residential Zone boundary and the Taumatakahu Stream transects some of the sites within the FDA. This stream is subject to esplanade reserve and public access provision as notated within the TPDP. The allotments typically follow the size and nature of that expected in a rural lifestyle area. A number of smaller lots are already found within this block of land. The site is already identified as FDA, and the submission does not seek any further amendments and simply registers support for the TPDP scheduling for the DAP process in SCHED15. Mechanics associated with maintaining natural character, as practical, would be undertaken through the DAP process and subsequent plan change.
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145	T Johnson	340 King Street
Submission and location:	<p>Site size is 0.96Ha.</p> <p>The submission seeks to rezone the property at 340 King Street Temuka. The submitter considers the property is not rural in nature, and seeks to rezone the property from General Rural Zone (GRUZ) to General Residential Zone (GRZ).</p>	
Comment:	<p>No technical landscape information was provided in support of this request.</p> <p>340 King Street (State Highway 1) in Temuka is already surrounded by small sections and contains an existing residential dwelling and mature vegetation. Both the site and immediately surrounding context exhibit a residential (although low density) character and amenity. The site is considered suitable for residential development from a landscape perspective, as the rural character has already been diminished in light of surrounding development.</p>	

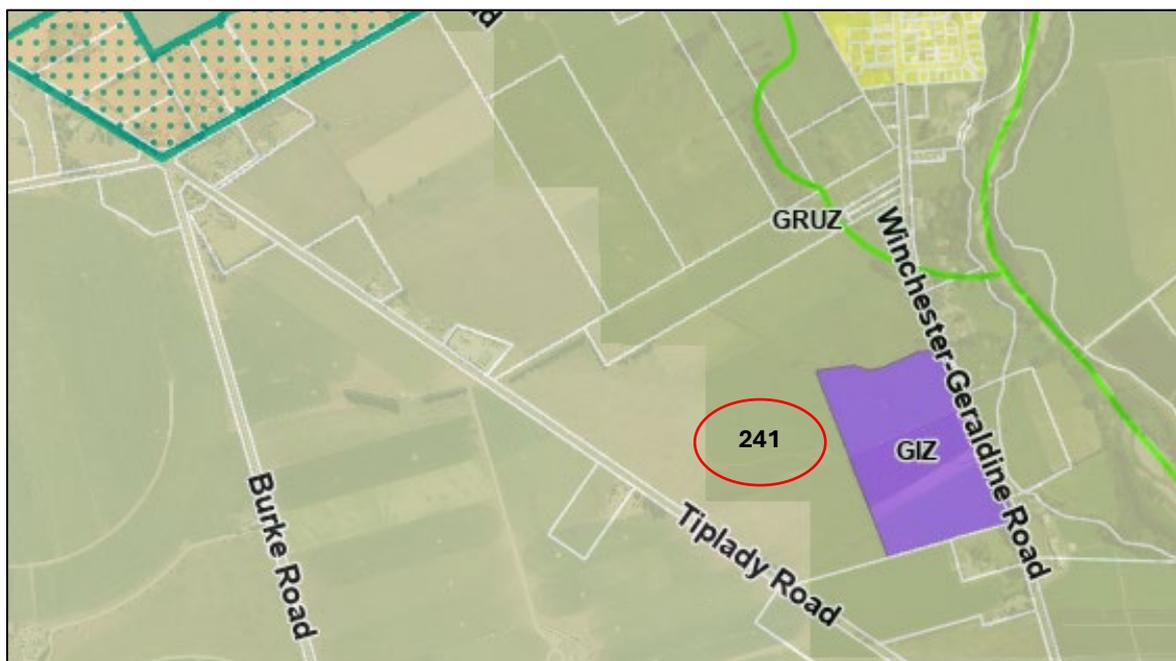
237	Aitken, Johnston and RSM Trust	26 and 52 Factory Road / FDA6
<p>Submission and location:</p>	<p>The amending proposal relates to a 17.93Ha block, which has an estimated residential yield of between 180 to 215 household allotments (10 – 12HH/Ha).</p> <p>The submission supports the intent of the Future Development Area Overlay (FDA6) across 26 and 52 Factory Road.</p> <p>The submission opposes the ‘beyond ten year’ time frame for the Development Area Plan, seeking to either amend SCHED15 to remove the timeframe associated with the FDA and rezone to General Residential Zone (GRZ), or amend the SCHED15 DAP timeframe to 5 years.</p> <p>The submission package also identifies a subsidiary relief, that the ‘strip’ to the south of the site that is not Highly Productive Land (HPL) is immediately zoned GRZ.</p>	
<p>Comment:</p>	<p><i>(see also response to other submission point - 156.157)</i></p> <p>No technical landscape information was provided in support of this request.</p> <p>FDA6 is located on the northern side of Temuka, along the east of Factory Road. This site currently provides open, rural character. The urban boundary to the north of Temuka is currently well defined along the southern boundary of this site, which in my view should be retained thereby precluding the subsidiary relief of a ‘strip’ of GRZ associated with HPL. FDA7 on the western side of Factory Road contains smaller lots and a number of rural-lifestyle properties, where the rural character has been compromised.</p> <p>While I consider the existing and future development of FDA7 to be an appropriate landscape outcome, the currently open, rural land included in FDA6 (which is the subject of this submission) does not display these characteristics associated with residential development.</p> <p>In my view, the openness, rural character and absence of rural lifestyle development makes this site less suitable for residential development from a landscape perspective as anticipated under the TPD as associated for FDA6. The urban growth boundary would be less clearly detectable, leading to an appearance of urban sprawl into the rural environment to the north of Temuka. Accordingly, I consider that from a landscape perspective an approach that consolidates the existing urban area is preferable to a more immediate residential expansion into this</p>	

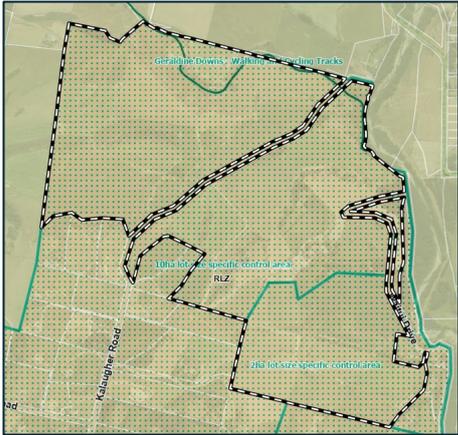
	<p>area. There is no support for that part of the submission that seeks immediate rezoning, or that the DAP process be brought forward to five years as sought.</p>
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Geraldine

Five submission packages have been received in relation to Geraldine.

Sub No.	Submitter	Address
19	Waitui Deer Farm Ltd	199 Waitui Drive
32	Bruce Selbie	77 Main North Road
128	W & E Scott	22 Templer Street
160	D & S Payne	20 Bennett Road
241	J Livestock Ltd	841 Tiplady Road



19	Waitui Deer Farm Ltd	199 Waitui Drive
<p>Submission and location:</p>	<p>The amending proposal relates to a 115.5ha block of land located to the north of Geraldine township and west over the Waihi River.</p> <p>The submission seeks to amend the minimum density size for Specific Control Areas in the Rural Lifestyle Zone for 199 Waitui Drive, Geraldine. The site is currently zoned RLZ and subject to two distinct density controls (10ha or 2ha) as Specific Control Areas. The submission seeks to amend the minimum density size for all Specific Control Areas to 2ha, which would provide for up to 30 allotment.</p> <p>The area relates to that part of Geraldine Downs which was identified as Rural Lifestyle and Rural Residential Sub Zone(s), as zoned Rural 4A under the Operative District Plan, including minimum subdivision sizes (Rural Residential sub-zone 2ha; Rural Lifestyle sub-zone 10ha; and Rural Production sub-zone 40ha. These were essentially 'rolled over' into the TPDP.</p> <p>The Submission package is at a conceptual level, inclusive of a landscape assessment by Wildlab.</p> <p><i>"... for the purposes of this stage of the hearings process a more conceptual approach has been taken to considering how the site could shift away from farming and be developed into a unique lifestyle development with a particular focus on how this could benefit the local ecosystems while still aligning with the nature of Geraldine Downs.... The Wildlab report is considered the</i></p>	

conceptual foundation of the future development....”².

Comment:

This submission was accompanied by a Landscape Conceptual Framework for development prepared by Wildlab landscape architects, which covers landscape and ecology considerations. The report examines the capacity and suitability of the site for a zoning that would allow 2ha lifestyle blocks, instead of the current 10ha minimum lot size. The report does not, however, provide an assessment of landscape and visual effects of the 30 buildings that would be enabled by this change in zoning.

Waitui Farm is a 115ha working farm located directly north of Geraldine. It is accessed along the gravelled Waitui Road, that extends along the western side of the Opihi River. The site is located on the outer slopes of the Geraldine Downs Area, facing in a north-easterly direction.

The Geraldine Downs Landscape Study (BML, July 2008) identified the north-eastern area that the site is located in as a visually sensitive rural landscape as it is viewed from lower-lying viewpoints to the north and east of the elevated downlands area (see Figure 1 below).

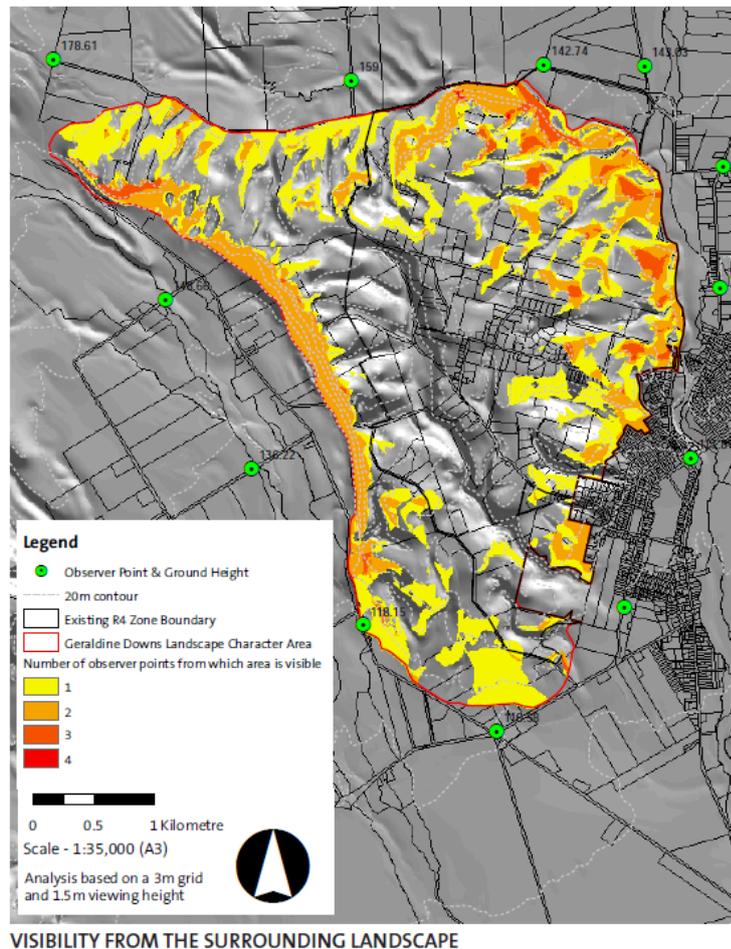


Figure 1: Geraldine Downs Landscape Study (Boffa Miskell, 2008), showing visibility of the study area (red outline) from outside viewpoints. The submitter's site is located in the north-eastern corner.

² Submitter Package. Waitui Farm [19.1]. McMullen [1]

The flat crests and tableland areas are less visible than the front faces providing for potentially greater visual absorption. The valleys and gullies are generally enclosed by landforms that limit views into them. While the gullies and valleys potentially have the greatest ability to visually absorb structures or changes, they also have other landscape values such as existing or potential ecological values. An analysis of landscape and visual sensitivity was one of the factors that assisted with the identification of the Rural Sub Zones within Geraldine Downs³, implemented through PC 17.

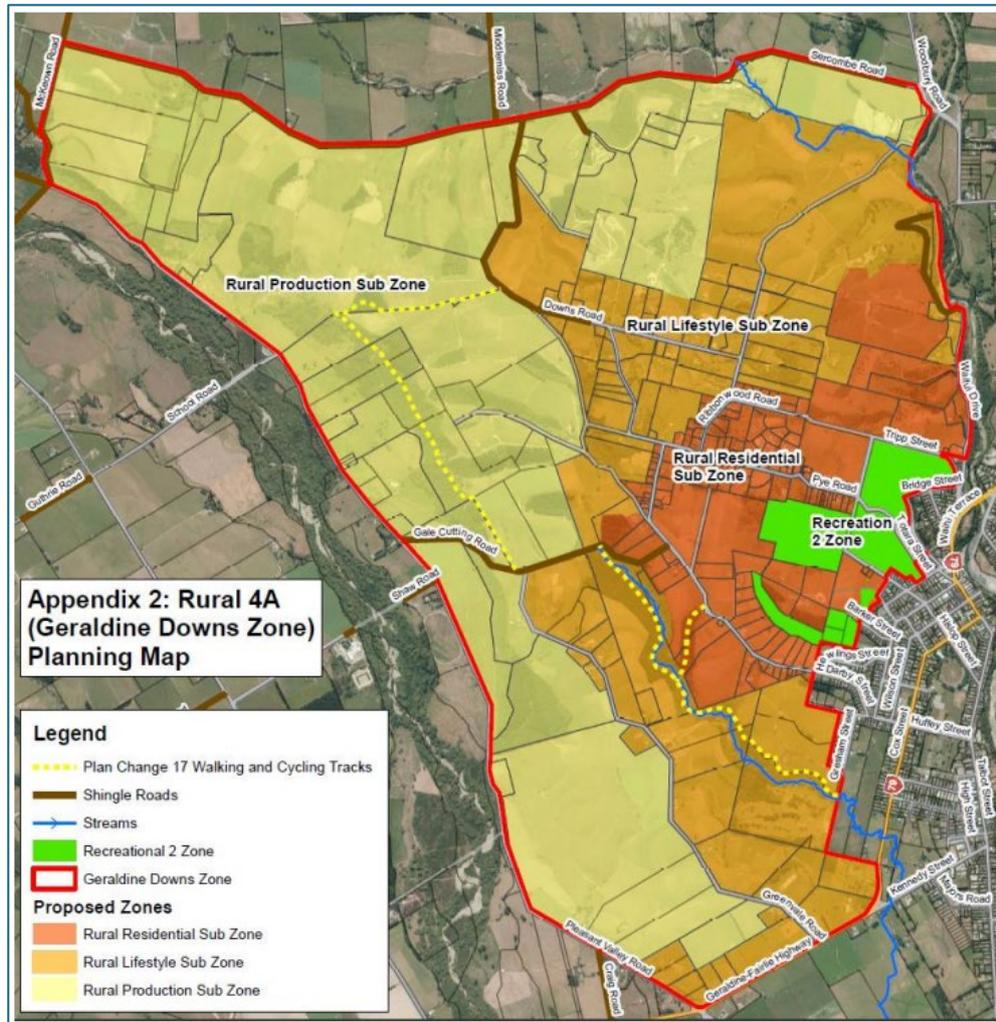


Figure 2: Geraldine Downs Zone Planning Map

Area A shown on the Landscape Assessment report (see below Fig 3, Wildlab) was included in the Rural Residential Sub Zone, while the remainder of the site (Areas B and C) were included in the Rural Lifestyle Sub Zone.

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- Rural Residential Sub Zone (2 ha minimum site area requirement for household unit)
- Rural Lifestyle Sub Zone (10 ha minimum site area requirement for household unit)
- Rural Production Sub Zone (40 ha minimum site area requirement for household unit)



Figure 3: Wildlab Assessment: Area A was included in the Rural Residential Sub Zone while Areas B and C were included in the Rural Lifestyle Sub Zone.

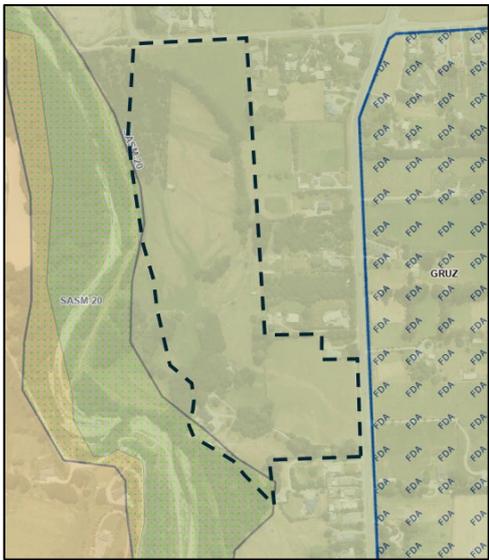
The Wildlab report provides an assessment of the ecological values and regeneration potential of the submitter's site, but does not address its visual and landscape character absorption capacity. It also does not identify where proposed building platforms would be located, or how these would relate to landform and potential revegetation areas, to enable further assessment of potential effects, nor is a mechanism advanced through the submission package that could be embedded in the TPDP.

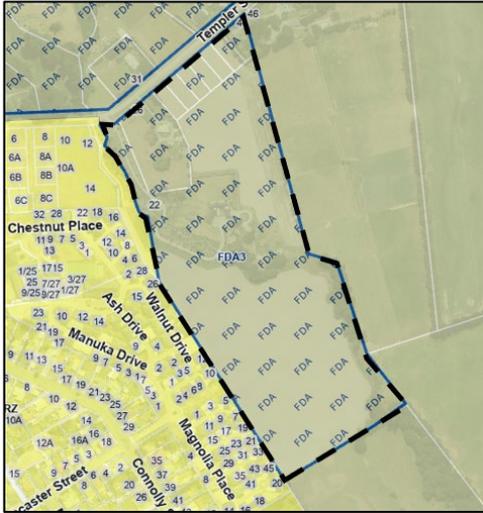
The site contains elevated rolling hill country that currently provides rural character around the outer part of the Downs landscape, as viewed from the north-east. Existing development along Kaulagher Road has already led to a change in character; however, in the elevated tableland location the visual effects are largely contained. Extension of the Specific Control Area overlay to provide for 2ha lots onto the outer slopes of the Downs would potentially result in adverse visual and landscape character effects that extend beyond the site, without sufficient certainty as to location of building platforms, access and associated earthworks, and mitigation planting and associated district plan mechanisms to ensure adverse effects on visual amenity and natural character were otherwise avoided, remedied or mitigated.

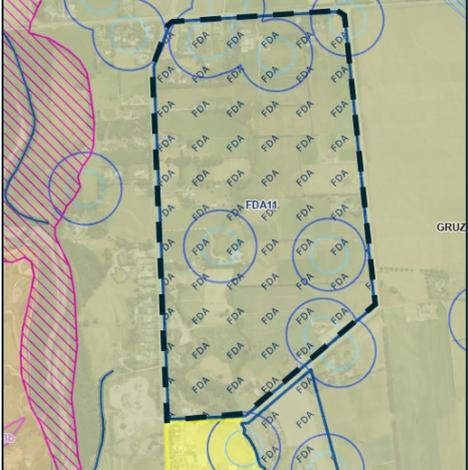
There may be specific locations that could be suitable for building platforms within the site, but the landscape is sensitive and this would require detailed consideration of a specific proposal, including dwelling design and location, access and earthworks, and landscape planting. The Wildlab report provides some innovative ideas regarding planting/ revegetation which could, given greater specificity and a directive district plan mechanism, potentially be supportable in this landscape.

However, the Wildlab assessment is too broadly set to provide certainty regarding landscape (and natural character) outcomes and effects, and there is no planning mechanism to be embedded in the district plan that would provide comfort that amenity and character would be maintained. A greater level of detail in the landscape assessment and accompanying plan mechanisms would be required to provide confidence in outcomes. That

	<p>level of specificity would be the outcome of either a detailed resource consent application with identified building sites, planting, access, trails, etc and implementation of the landscape strategy, or through a specific development plan and accompanying detailed provisions.</p> <p>In my view there is insufficient detail provided in the submitter package, including the Wildlab assessment to provide confidence that an increase in density could be appropriately accommodated in this elevated tableland landscape without adverse landscape character and visual amenity effects.</p>
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32	Bruce Selbie	77 Main North Road
Submission and location:	<p>Site size is 5.45Ha.</p> <p>The submission seeks that the site at 77 Main North Road, Geraldine be zoned Rural Lifestyle Zone (RLZ) rather than General Rural Zone (GRUZ).</p> <p>The yield at a 2ha minimum density would be one (1) additional dwelling.</p> <p>The yield at 5,000m² (as subject to the provision of reticulated wastewater) would be three (3) to four (4) additional dwellings.</p>	
Comment:	<p>No technical landscape information was provided in support of this request.</p> <p>Currently the road frontage in the eastern part of the site forms a gap between existing smaller lots. While the development of this part of the site into similarly sized sections (around 5000m²) along the road is considered to be in character with the adjacent sites to the north, the subdivision of the pastoral part of the site adjacent to the Waihi River would be a departure from the existing development pattern, with a sprawling extension into land that currently displays rural and natural character attributes.</p> <p>In my view, the Waihi River, its margins and associated low-lying terraces are more sensitive to change. Rezoning of this part of the site is therefore not supported from a landscape and natural character perspective.</p>	

128	W & E Scott	22 Templer Street
<p>Submission and location:</p>	<p>The submission relates to some 11.4ha at the north-eastern end of Geraldine, with a potential development yield of between 110 to 130 residential allotments (at densities of circa 10 – 12 Households / Ha).</p> <p>The area subject to FDA3 is largely held in one title (22 Templer Street ‘the Scott’s’ at 10.36ha), with two smaller titles fronting Templer Street (No. 26 at 0.813ha, and No. 44 at 0.141Ha).</p> <p>The submission supports FDA3. The submission also seeks, as an alternative, an immediate rezoning to General Residential Zone (GRZ).</p> <p>Whilst an ‘indicative concept layout’ is included in the submission package, there is no mechanism identified to embed this, or its outcomes, into the district plan.</p>	
<p>Comment:</p>	<p>This site is identified as an FDA, located adjacent to existing residential sections along Templer Street and Walnut Drive/ Magnolia Street (retirement village). The site is confined by a stream on the eastern side and already contains subdivided smaller sections along the road boundary. The submitter supports FDA3 but also requests an immediate rezoning. I consider that there are no specific landscape reasons to oppose this, should expansion of Geraldine in a north-easterly direction be required.</p> <p>In order to ensure that the existing landscape and natural character values, such as those associated with the Raukapuka Stream, are maintained, I would recommend that any immediate rezoning should be accompanied by a structure plan/ ODP to be embedded in the TPD to direct subsequent development. As part of this, the treatment of the open space along the stream should be defined to illustrate how this feature could enhance natural character values associated with any residential development, and the structuring of development to provide a defensible urban boundary where practicable.</p>	

160	D & S Payne	20 Bennett Street
<p>Submission and location:</p>	<p>The submission package is focused on the Payne property at 22 Bennett Street (8.79ha), but relates to a broader area of 56ha, as fully contained within the road network of Main North Road / SH76, Bennett Road and Templer Street.</p> <p>The submission opposes FDA11, inclusive of its associated rule and development timeframe. The submitter considers it is unreasonable to prevent future development for a period of ten years and that the block should be rezoned as Rural Lifestyle Zone (RLZ) now.</p> <p>At a density of 2Ha / allotment as I understand would be restricted through a lack of connection to wastewater reticulation, an additional six (6) allotments could be added, as fronting Templer Street to the east, and Bennett Road to the north, as those sites fronting Main North Road would not be able to be further intensified. At a density of 5,000m² should wastewater reticulation a more substantial number of allotments would be enabled. There is no landscape analysis of either density contained in the submission package.</p>	
<p>Comment:</p>	<p>No technical landscape information was provided in support of this request, or structure plan / ODP as to configuration or density of development. It is understood that this would be produced through a DAP process under SCHED15 and Policies FDA-P2 and FDA-P4.</p> <p>This FDA contains the block between Templer St/ Main North Road and Bennett Road to the north of Geraldine and already contains several rural lifestyle lots, in particular along the western and northern boundaries. The central part of the block contains an orchard.</p> <p>Raukapuka Stream extends through the central part of the FDA and the riparian planting has been undertaken along the margins. Should development be undertaken in vicinity of the stream, setbacks / esplanade reserve would be required in order to protect its natural character values.</p>	

The submission seeks to bring forward the rezoning as signalled in SCHED15 for a DAP timetable of 10+ years to an immediate rezoning as RLZ. This would also foreclose the DAP process and associated embedded mechanisms to guide development within the district plan (such as a structure plan / ODP).

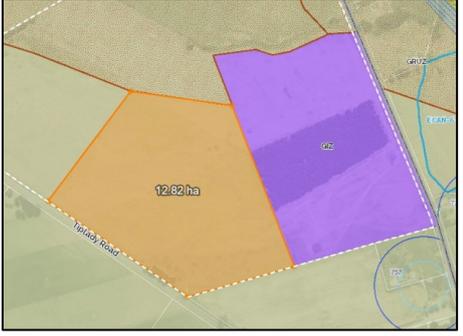
The focus of the landscape consideration is therefore whether the landscape outcomes would be substantially different under each approach.

I also understand from the Council's Engineering Team that there is no funding provided in the LTP to provide wastewater reticulation to connect to this area, which I understand would limit development to a minimum density of 2 Ha/allotment.

At a density of 2Ha / allotment, I do not consider there to be any landscape basis for retaining the notified TPDP approach for the SCHED15 10 year + DAP process. Only a handful of additional rural lifestyle lots would be enabled and these would be consistent with the existing character and amenity within the block. Given that those lots that could be further subdivided to achieve 2ha lots are located within the centre of the site, and some of the outer lots currently provide a rural-lifestyle character, I consider 2ha lots to be an appropriate landscape outcome that maintains a degree of openness between the two nodes that contain smaller properties in the north-western and south-western corners. I do not consider there to be a landscape basis as to why such an outcome could not be delivered under an immediate rezoning, noting that the esplanade reserve overlay in the TPDP would also provide opportunities for maintaining and potential enhancing natural character associated with the Raukapuka Stream.

A minimum lot size of 5000m² would be smaller than the existing surrounding lots and, in my view, it is likely that the amenity of the outer lots would be compromised to some extent by the proximity of other dwellings in the centre, with an associated change of semi-rural outlook and open space. In addition, in the absence of an embedded structure plan / ODP in the district plan, it is not clear if the remaining landscape/ natural character and amenity values associated with the block would be able to be maintained or enhanced.

In my view, it would be acceptable from a landscape effects perspective to develop the internal lots to similarly sized rural lifestyle allotments (around 1.5Ha to 2Ha) which would be consistent with the existing landscape character and development. The sites around this block of land provide relatively high amenity with mature trees; effects of additional dwellings set within a relatively high level of open space would be largely internalised.

241	J Livestock Ltd	841 Tiplady Road
<p>Submission and location:</p>	<p>The submitter seeks to add a Future Development Area (FDA) overlay over 12.82ha of land between the notified GIZ to the south of Geraldine fronting Winchester-Geraldine Road to connect to Tiplady Road.</p> <p>The anticipated zoning sought is General Industrial Zone (GIZ). The DAP timeframe sought is 10+ Years.</p> <p>The property at 841 Tiplady Road, as bounded by Tiplady Road to the southwest, and the notified General Industrial Zone which relates to that part of the legal title fronting Winchester Geraldine Road.</p>	
<p>Comment:</p>	<p>No technical landscape information was provided in support of this request.</p> <p>There does not appear to be a landscape-based rationale for the existing (but currently undeveloped) GIZ along Winchester- Geraldine Road. The site currently provides open rural character with relatively high amenity on the southern entrance to Geraldine township which will change once the zoning is implemented. The existing GIZ will have adverse landscape and visual effects on views from Winchester- Geraldine Road, but the 350m setback from Tiplady Road means that the currently zoned GIZ (without the extension to the west proposed by the submitter) would not have high visual effects on the western side.</p> <p>The extension of existing GIZ into the western part of the site to connect with Tiplady Road would, in my view, lead to a proliferation of industrial sized buildings with moderate to high landscape and visual effects into an area that currently is not substantially affected by the existing GIZ. The request for GIZ (as associated with an FDA and 10+ year DAP process) is not supported from a landscape/ visual effects perspective.</p>	

Timaru South

Two submission packages have been received in relation to that area south of Timaru settlement.

Sub No.	Submitter	Address
20	T & A O'Neill	93A Coonoor Road, Timaru
30	C & S McKnight	60 Landsborough Road, Timaru



20	T & A O'Neill	93A Coonoor Road
Submission and location:	<p>The submitter seeks rezoning from General Rural Zone (GRUZ) to General Residential Zone (GRZ).</p> <p>The amending proposal has a spatial area of 6.7ha, and at a density of between 10 – 12 HH/Ha would provide for an additional 65 – 80 households, depending on the extent of on-site stormwater management and the provision of additional esplanade reserve.</p> <p>The amending proposal adjoins the Ōtipua Creek to the west with the 'urban area' boundary to the east.</p>	

<p>Comment:</p>	<p>No technical landscape information was provided in support of this request.</p> <p>The site is adjacent to the Otipua Creek North Branch which includes a walkway that accesses the Centennial Park Scenic Reserve. The area is low lying, located below existing residential area and Otipua Creek would form the western landform boundary.</p> <p>Based on landscape and visual effects, residential rezoning is considered appropriate, as the low-lying site is visually not prominent and is contained by existing development and a distinctive landform boundary.</p> <p>The natural character effects may require additional information and a meaningful setback from the creek is recommended to ensure the natural character values of the stream and its margins are protected. As part of the development of the area green/ blue corridor considerations should be taken into account in the design and layout of the residential area. These considerations relating to the Otipua Creek corridor would, in my view, be best addressed through the preparation of a structure plan / ODP to ensure the values are protected through sensitive design.</p>
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<p>30</p>	<p>C & S McKnight</p>	<p>60 Landsborough Road, Timaru</p>
<p>Submission and location:</p>	<p>The submitter seeks to extend the notified Specific Control Area overlay (Brookfield Road) and Rural Lifestyle Zone over additional areas legally described as Lots 5 and 6 DP502319 which has a combined land area of 26.7ha.</p> <p>The submission package appears to narrow that relief to a Rural Lifestyle Zone (RLZ) extension of some 1.25Ha (to provide for five additional allotments) and an Open Space Zone (OSZ) (for land to be offered to the Timaru District Council) of some 7.6Ha fronting Otipua Creek. This should be clarified by the submitter.</p> <p>The submission package identifies it is <i>'primarily seeking to achieve five additional Rural Lifestyle allotments adjacent to the area known as Brookfield Height subdivision. This would give effect to the final five allotments provided for in the Brookfields Heights Rural Lifestyle Zone in the Operative District Plan'</i></p>	

Comment:

No technical landscape information was provided in support of this request.

The development proposed for the site consists of five additional Rural Lifestyle allotments, located next to the existing subdivision 'Bluerise Development' which is currently being developed. The existing subdivision provides a setback of buildings from the crest of the ridge.

The crest and east-facing slopes fall within this currently proposed site. The proposal to provide for five Rural Lifestyle Allotments in this location would mean that these additional buildings would likely appear on the skyline when viewed from Otipua Creek, walkway and Centennial Park reserve below due to their elevated location along crest of the hill. This may lead to visual prominence from these open spaces and potentially from residential areas to the east.

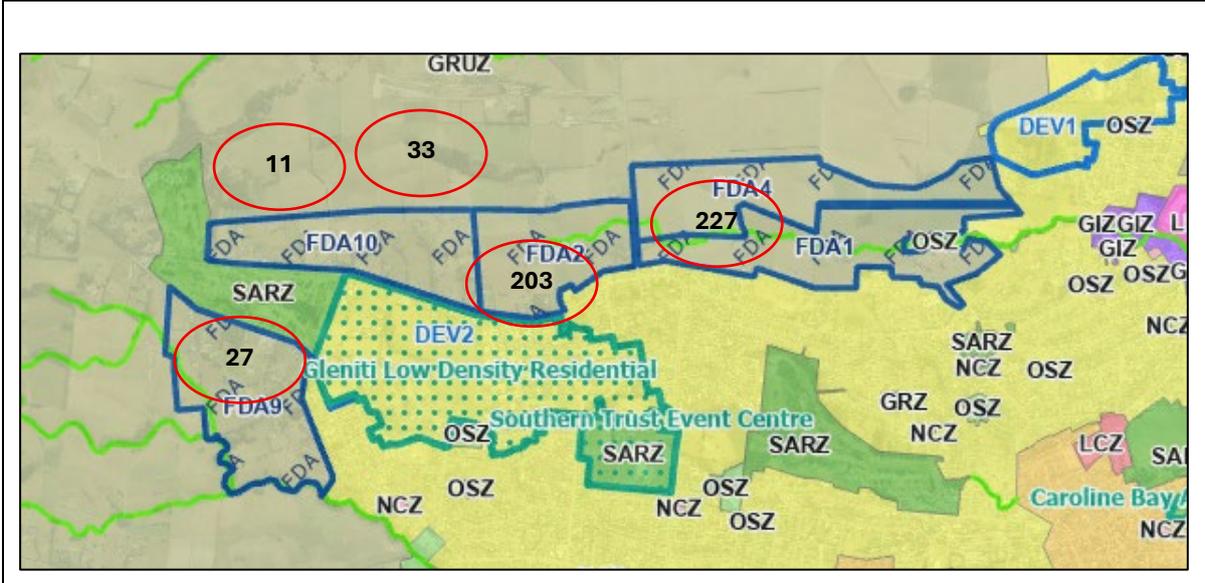
The current setback maintains a distinction to the main urban area, while the proposal would result in the encroachment of building platforms from the Bluerise subdivision and a more manicured edge extending down from the crest of the ridge. This would reduce the ability of the existing 'green buffer' to retain an urban edge north of Otipua Stream.

In my view, more detailed information is required to adequately assess the visual effects of the proposal, as building locations in relation to the change in landform would influence their visual dominance on the open space below and the perception of urban encroachment.

Timaru North – Pages Road and Gleniti Road

Five submission packages have been received in relation to that area south of Timaru settlement.

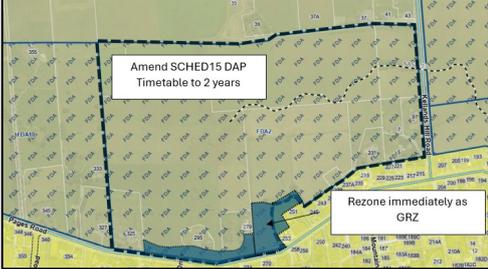
Sub No.	Submitter	Address
11	Gerald Morton	509 and 427 Pages Road, Timaru
27	Rabbidge, Singline and RSM Trust	210 Gleniti Road, Timaru
33	Pyke, Ford, Andrews, Talbot, Wilkins, Proudfoot, Craig and Mackenzie	333, 355, 365 375, 385, 397 and 403 Pages Road, Timaru
203	Pages Trust and Russell Trust	251, 273, 279 and 295 Pages Road, Timaru
227	Rose Westgarth and Jan Gibson	82 Kellands Hill Road, Timaru

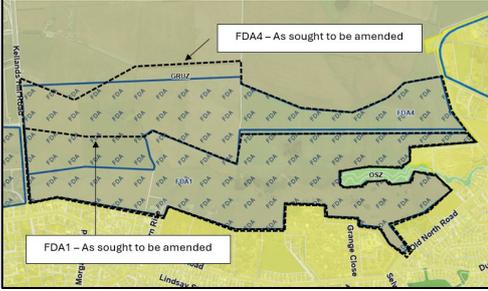


11	Gerald Morton	509 and 427 Pages Road, Timaru
Submission and location:	<p>The submission seeks to amend FDA10 should be extended to include 509 and 427 Pages Road, Gleniti.</p> <p>The associated area is 49.0 Hectares and consists of three moderate scale rural blocks of 17.2Ha, 22.0Ha and 10 Ha respectively.</p> <p>FDA10 is anticipated for Rural Lifestyle Zone with a DAP process as 'Priority Area – 5 Years'.</p> <p>At a density of 2Ha/allotment (in the absence of wastewater reticulation) an addition 20 allotment would be anticipated.</p>	
Comment:	<p>The submitter requested a review of proposed FDA10 to include the extent of properties set further back from Pages Road. No technical landscape information was provided in support of the request.</p> <p>Proposed FDA10 enables easy access and servicing due to the vicinity to Pages Road. As proposed, FDA10 aligns with other FDAs to the east in relative proximity to the road (approx 200m). These FDAs capture the already developed, smaller sections along Pages Road.</p> <p>The proposed extension of FDA10 would extend into the hinterland, which includes rolling hills that currently display a strong rural character with relatively high amenity. In my view, the proposed extension of FDA10 extension would lead to a substantial change in development pattern and adverse effects on rural character. In relation to this, I also note that the extent of proposed FDA10 is consistent with the outcomes of GRUZ-O2 which sets out the character and qualities of the General Rural zone.</p>	

27	Rabbidge, Singline and RSM Trust	210 Gleniti Road, Timaru
Submission and location:	<p>The submission seeks that the DAP timeframe for FDA9 be shortened from 5 years to 2 years.</p> <p>FDA9 anticipates a Rural Lifestyle Zone with a DAP formation process of 5 years (SCHED15)</p> <p>The submission (and FDA9) relates to a 51ha land area that borders the Gleniti Golf Course and Gleniti Road to the north, and the southern boundary follows Opitua Creek; the eastern boundary adjoins the General Residential Zone (GRZ) to the east, and a larger 10ha rural landholding (Sub 217.1) adjoins FDA9 to the east.</p> <p>At a density as serviced by wastewater reticulation, a potential capacity of 87 dwellings would be provided</p>	
Comment:	<p>No technical landscape information was provided in support of this request.</p> <p>This site already contains small lot sizes along its northern road boundary and is bordered by a residential zone to the east. The site is identified as FDA9 and the submitter seeks to bring the anticipated rezoning forward from 5 to 2 years.</p> <p>The southern site boundary follows Otipua Creek which forms a distinguishable landform boundary. In order to maintain the amenity and natural character values of the stream, setbacks from Otipua Creek are recommended. As part of the development of the area green/ blue corridor considerations should be taken into account in the design and layout of the residential area.</p> <p>If an appropriate design is prepared for the development of the site, taking into account natural character and amenity considerations, it could be appropriate to bring the development of the FDA forward from 5 to 2 years in light of existing and adjacent residential development.</p>	

33	Pyke, Ford, Andrews, Talbot, Wilkins, Proudfoot, Craig and Mackenzie	333, 355, 365 375, 385, 397 and 403 Pages Road, Timaru
Submission and location:	<p>The submitter seeks to extend the boundaries of FDA10 to include all of the land at 333, 335, 365, 385, 397 and 403 Pages Road, and the DAP preparation process in SCHED15 be amended to 2 years (rather than 5 years).</p> <p>FDA10 anticipates a Rural Lifestyle Zone.</p> <p>The area associated with the requested extension is 21ha. An anticipated yield, in the absence of wastewater reticulation would be in the order of 10 two-hectare allotments, and 20 where reticulation was to be provided.</p>	
Comment:	<p>No technical landscape information was provided in support of this request.</p> <p>The lots to the east and west of this site are not identified as FDA, and the submitter to the west also requested inclusion in FDA 10 (Morrison, submission 11). Neither of the two sites provided a landscape assessment within the submission package which provides any analysis of landscape/ visual effects supporting the rezoning sought.</p> <p>The site is located immediately to the east of the property in which is the subject of Submission 11 (Morton). The site contains an area of mature vegetation in its northern part, while the southern halves of these elongated sites already contain dwellings. While the four elongated sites are still close to 10ha in size, smaller residential properties have been subdivided off these sites along Pages Road (approx 5000m²). Proposed FDA10 includes these smaller sites and the dwellings present on the 10 ha sites. The submitter requests extension of the FDA onto the northern halves of the sites that currently display rural openness.</p> <p>The extension of FDA10 into this currently rural area with rolling hill country would, in my view, constitute sprawl that is not in character with the FDAs identified to the east, as it would extend much further north from Pages Road.</p>	

203	Pages Trust and Russell Trust	FDA2 and 251, 273, 279 and 295 Pages Road, Timaru
Submission and location:	<p>The submission seeks:</p> <ul style="list-style-type: none"> • A reduction in the DAP preparation process for FDA2 to 2 years (from 5); and that • The front portion of Pages Road (251, 273, 279 and 295 Pages Road) be rezoned immediately to General Residential Zone. 	
Comment:	<p>No technical landscape information was provided in support of this request.</p> <p>The submitter requested to bring the zoning to GRZ forward due to existing fragmentation and geophysical boundaries. The site is already partially developed with rural lifestyle dwellings. While Rural Lifestyle development would be largely in character with existing development further west along Pages Road, the northern part of the site is currently in rural land use with open character on rolling hill country. For the northern part of the FDA, there does not appear to be any specific landscape rationale to bring the FDA development into GRZ forward. However, I consider that the earlier development of the part of the FDA located immediately adjacent to Pages Road could be considered for earlier development without adverse landscape character effects, as it would fill the development between the residential zone at 253 Pages Road and the more sporadic dwellings to the west.</p>	

227	Rose Westgarth and Jan Gibson	82 Kellands Hill Road, Timaru
Submission and location:	<p>The submitter supports enabling the southern part of 82 Kellands Hill Road for urban development but is concerned that the proposed Urban Development Area (FDA1) does not accurately reflect the sites contours and physical features.</p> <p>The submitter would prefer an approach to rezone FDA1 to General Residential (GRZ) immediately removing the FDA overlay.</p> <p>The submission in full states:</p> <ol style="list-style-type: none"> 1. <i>Rezone areas identified as FDA1 as identified in the</i> 	<p>The plan below shows the notified TPDP and the alignment relief as requested.</p> 

	<p><i>location map in the original submission from GRUZ to GRZ and remove the FDA1 overlay.</i></p> <p><i>2. Undertake any consequential amendment to give effect to the rezoning and pathway for Development Area Plan preparation.</i></p> <p><i>3. If the rezone is not accepted, then amend the FDA boundary lines between FDA1 and FDA4, and the northern boundary of FDA4 as shown in the plan provided in the submission.</i></p>	
<p>Comment:</p>	<p>No technical landscape information was provided in support of this request.</p> <p>The site is located at 82 Kellands Hill Road, at the northern extent of Timaru's urban environment. The subject site is intersected by multiple waterways (Oakwood Stream and Washdyke Creek to the North and Taitarakahi Creek to the south).</p> <p>The submitter requests to amend the boundary between FDA1 and FDA4 to follow topography and to better align with landform (ridges) within the site. Based on my site visit findings I can confirm that the proposed boundary would be suitable to demarcate the extent of FDA1, as it falls along a high point in the landform, as well as a node of existing residential dwellings on the western side of Kellands Hill Road, extending along a private lane. This would mean that future development would align with both landform, an existing cluster of dwellings and FDA2 on the western side of Kellands Hills Road. I am supportive of this request.</p> <p>In addition, the submitter requests an amendment of the northern FDA1 boundary, where it adjoins GRUZ. While I have not been able to visit this eastern part of the site (as it is difficult to see from Kellands Hills Road), the requested changes appear to be relatively small in scale. It is possible that the request is acceptable from a landscape/ visual perspective if they align with the landform. In order to assess how the request relates to topography, detailed (1m contours) would be required from the submitter.</p> <p>The submitter also requests an immediate rezoning from GRUZ to GRZ, as it relates to FDA1. It is understood that since notification of the PTDP, Council is preparing a draft Development Area Plan (DAP) covering the site, based on initial technical investigations and reports. From a landscape perspective there is no particular reason to specifically support this request to develop FDA1 earlier, as the site is currently in rural land use to the north of a well defined urban boundary. Residential development has not yet spread into FDA1, which would mean that rezoning will lead to a substantial change from the existing open character to a high level of modification. Based on the potential natural character and visual amenity effects of the stream, I recommend the requirement for</p>	

an ODP / structure plan to ensure these values are provided for in subsequent development rather than an immediate rezoning in the absence of such an ODP / structure plan.

I note that residential development should take into account and protect the natural character of the stream within FDA 1 and 4 through setbacks of development. These stream corridors should be integrated into the design to allow for blue/ green corridors to achieve high amenity and appropriate natural character outcomes.

Washdyke, North

Five submission packages have been received in relation to that area south of Timaru settlement.

Sub No.	Submitter	Address
157	Ryan De Joux	105 Kennels Road, Washdyke
190	North Meadows and Thomson Engineer	236 Meadows Road, Washdyke
248	White Water Properties Ltd	FDA13



157	Ryan De Joux	105 Kennels Road, Washdyke
Submission and location:	<p>The submitter seeks that the FDA14 timeframe identified in SCHED15 be amended from 10 years to 5 – 10 years.</p> <p>FDA14 is identified in SCHED15 for 'urban' with a DAP preparation process of 10+ years.</p> <p>The subject area is a total of 53Ha held in three titles, with the largest being under the control of the trustees of Timaru Racecourse (at some 31ha, 330 Hilton Highway).</p> <p>The submission package is focused on 105 Kennels Road</p>	

	(that land owned by TDP at 17 Ha) and a yield of 150 lots at medium density is proposed.	
Comment:	<p>No technical landscape information was provided in support of this request. I note that submissions have also been received seeking the removal of these FDAs [NZTA [143.198] for FDA14 only and CRC [183.166] for FDA13 and FDA14.</p> <p>FDA 14, identified to the north of Washdyke, is intended for urban (although the submission package is predicated on residential) development which would be separated from Timaru township by the presence of large industrial zones and the racecourse (with its associated open spaces that provide rural character). Given that this FDA would be disconnected from the existing township, including public facilities/services, transport and amenities, it does not appear to be particularly suitable for residential development.</p> <p>The FDA sites currently provide a rural character with limited rural lifestyle development to the north. Currently FDA 13 has a well-defined boundary to the industrial zone to the south and only few dwellings are located within it. FDA 14 contains large paddocks that appear to be grazed in association with the racecourse, and there is currently very limited residential development within the FDA. This area to the north of the racecourse has a largely open, rural character.</p> <p>In my view, FDA 14 currently does not provide characteristics associated with peri-urban development. Development of this FDA would lead to residential / urban sprawl to the north of Timaru in an area where the urban boundary is currently well defined. In light of the FDA location, disjointed from Timaru Township by the Washdyke industrial area and the racecourse, this site does not provide the landscape and urban design attributes that would make it suitable for future residential development, in my opinion.</p> <p>Information associated with the submission package for FDA14 is predicated solely on the property at 105 Kennels Road (17ha) which represents less than a third of the entire 53Ha. There is no discussion, or mechanisms identified in the submission package as to how the submission relief (5 years rather than 10+ for DAP preparation) would result in a more integrated and comprehensively developed outcome.</p>	

190	North Meadows and Thomson Engineer	236 Meadows Road, Washdyke
Submission and location:	<p>The submitter seeks that 236 Meadows Road as General Industrial, but extends the scope of the submission to:</p> <p><i>'adjoining properties that lie or are located between the site and Aorangi Road for consideration of rezoning to General Industrial Zone (GIZ)... and ... extend the GIZ to also cover the treatment ponds on the north side of Aorangi Road along with the Council land mentioned above to line up with the alignment of northern boundary of 236 Meadows Road, thus creating one contiguous zone'.</i></p> <p>The amending proposal therefore relates to an area of some 86ha.</p> <p>However, I understand from Mr Bonis (TDC s42A Reporting Officer) that the focus of this assessment should be on that area outside the WWTP Designation, being an area of 34Ha.</p>	
Comment:	<p>No technical landscape information was provided in support of this request.</p> <p>I understand from the s42A Reporting Officer, Mr Bonis, that a number of consents have been issued in relation to the site. Mr Bonis has provided the below diagram to assist in this assessment as to consented activities on the site.</p>	



The submitter already has obtained a resource consent for a building that is currently being constructed on part of the site as above (with a maximum height of 17.5m), and it is understood that consents provide for industrial buildings on the corner of North Meadows and Aorangi Road (at a height of less than 15m).

The site currently provides low landscape and amenity values and is adjacent to the wastewater ponds to the east and GIZ to the south. In my view, rezoning of the site to industrial would be in character with its existing and adjacent land use. The shelterbelt on the northern side of the site currently delineates the boundary of the site, as well as the wastewater treatment pond. The rural land to the north currently provides open, substantially less modified, rural character. Alignment of the northern zone boundary with the wastewater treatment pond would, in my opinion, demarcate an easily defensible boundary, similar to the northern GIZ boundary on the western side of Seadown Road.

It is also understood that the submission seeks an extension of the 35m Height Specific Control Overlay over any rezoned area as subject to the submission. I understand that the currently consented buildings (less than 15 and 17.5m in height) are in line with the base height allowed for in Industrial Zones (15m). In my view, the application of a 35m height limit would mean that buildings in the submitter's site are substantially higher than any other built form in its surroundings. In my view, this could lead to significant landscape and visual effects well beyond the site boundary. I, therefore do not support the 35m height limit, but consider that a 15m limit should be applied to buildings.

I understand that highly productive soils occur on the part of the site that currently does not have a consent, but other experts will comment on this, as it falls outside my area of expertise.

248	White Water Properties Ltd	FDA13
<p>Submission and location:</p>	<p>The submission from White Water Properties [248] seeks that all land within FDA13 should be rezoned GIZ as the submitter considers the land is ideally situated for industrial development.</p> <ol style="list-style-type: none"> <i>1. Rezone all of the land in FDA13 to General Industrial, and</i> <i>2. Make any necessary amendments to support the rezoning</i> <p>Ryan De Joux [157] seeks that the FDA13 timeframe identified in SCHED15 be amended from 10 years to 5 – 10 years.</p> <p>The site is 61Ha and is notated as FDA13 with an anticipated General Industrial Zone and DAP preparation process of 10+ years in SCHED15.</p>	
<p>Comment:</p>	<p>I am aware that CRC have submitted [183.66] to amend the Future Development Areas to only identify land as a future development area where it is required in the short to medium term as defined in the NPD-UD.</p> <p>No technical landscape information was provided in support of this request.</p> <p>This site is located adjacent to the rail corridor to the north of the existing industrial zone, north of Washdyke. Large scale industrial sheds/ buildings are located within the existing adjoining industrial zone to the south. However, the sites contained within FDA 13 are mostly larger properties with rural land uses.</p> <p>Currently FDA 13 has a well-defined boundary to the industrial zone to the south and only a few dwellings are located within it. A few clusters of rural-lifestyle dwellings are separated by open pastoral areas. The rezoning of this FDA will lead to a substantial change in landscape character from the currently relatively open, rural character. However, given that the existing GIZ lies immediately adjacent to this FDA (and extending slightly further north to the east) I consider that industrial land uses would not be an unexpected activity in this environment when required in future.</p>	