

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

**UNDER** the Resource Management Act 1991 (RMA)

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

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**STATEMENT OF EVIDENCE OF SONIA REID DOLAN  
ON BEHALF OF CLIENT TIMOTHY GRAEME BLACKLER  
(SUBMITTER NO. 231)**

**27<sup>th</sup> June 2025**

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## **Introduction, Qualifications and Experience**

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

## **Scope of my Evidence**

- 6 My evidence relates to the Blackler submission on the PDP – Growth chapter. It addresses:
  - (a) the relief sought in the submission;
  - (b) the recommendations set out in the Section 42A Report.
- 7 In preparing my evidence I have reviewed:
  - the PDP;
  - the Section 42A Report for Hearing G: Growth of the PDP by Mr Matt Bonis.
  - the original submission on the PDP;
  - the National Planning Standards;
  - the National Policy Statement for Highly Productive Land (NPS-HPL);
  - National Policy Statement on Urban Development 2020 ("NPS-UD")

- Any supporting evidence

### **The submissions**

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

To rezone 10 Burke Street in Pleasant Point to a General Residential Zone (GRZ) immediately;

Or

The alternate relief sought is to enable the site to be zoned GRZ through a Future Urban Zone as a planning mechanism.

### **Relief sought**

- 9 The client wishes to establish an aged care and retirement village within the site. Should Council not be accepting of an immediate rezone, alternative relief sought is a request for a Future Urban Zone (FUZ) with the view for a change to live zone of general residential once a structure plan is in place. This will align to better serve and future proof the future urban development within the site and will ensure efficiency and integration with infrastructure planning.
- 10 As part of the package of the relief sought, I propose expert caucusing (post the hearings timeframe) to formalise and reach agreement as part of the District Plan review.

### **FURTHER INFORMATION PROVIDED TO TIMARU DISTRICT COUNCIL**

- 11 Following the release of the preliminary S42a report, all submitters had to provide for the required information by 20 February 2025. This is attached in **Appendix A**.
- 12 The information was supplied to Council to address the planning framework, servicing considerations, environmental values and site-specific matters. Of relevance the matters included;
- a) The existing and proposed environment, including configuration of titles and geophysical boundaries that would delineate the requested zone boundaries.
  - b) NPS: UD assessment

- c) NPS: HPL assessment against Clause 3.6
- d) An assessment in relation to the Canterbury Regional Policy Statement
- e) Proposed Timaru District Plan
- f) Servicing matters to address infrastructure considerations to include Three waters, Transport, and Electricity and Telecommunications
- g) Hazard assessment – specifically liquefaction and flood hazards.
- h) Environmental Values

### Section 42 report and deliberations

- 13 Mr Bonis sets out several matters within the Section 42A Report. They relate to satisfying the legislation and tests as set out under the various planning matters as set out under the NPS:UD and NPS:HPL. Other matters include infrastructure provision, flood risk and traffic effects.
- 14 Given the further information was supplied on the 20<sup>th</sup> February 2025 as set above, within the s.42 report Mr Bonis agreed with Notified zoning, landscape, biodiversity and cultural values. We further comment on his points below.
- 15 Mr Bonis summarises the **Biodiversity** as “*Values are attributable to the Pleasant Point Stream, which is notated for esplanade reserve and public access provisions (Natural Values). I consider that subdivision enabled by a General Residential Zoning would facilitate the provision of an esplanade reserve. I note that this is not identified in the Submitter package, nor does the accompanying ‘Concept Plan’ identify the minimum width required*<sup>359</sup>”
- 16 We note that no subdivision of the site is anticipated, which is why esplanade reserves were not shown on previous plans. On receipt of supporting s42A reports, feedback has been considered and a protection zone along the south side of the Pleasant Point Stream is now volunteered to protect the values associated with the Pleasant Point Stream. Refer to **Appendix C: Outline Development Plan.**
- 17 Mr Bonis summarises the **Cultural Values** as follows: *These are notated as SASM-16 (Wai Taoka Lines – Opihi River and Tributaries). No additional mana whenua considerations have been provided in the package. The Manawhenua assessment provided by Ms Hall has identified that the mauri of the Ōpihi River and its tributaries (including the Pleasant Point stream*

*which runs through the site) is a priority for Kāti Huirapa. Ms Hall advises that Kāti Huirapa is not opposed to development on the site, provided that the stream is protected from further degradation. There is also concern that the concept plan would alter the flow patterns of the waterway to create a manmade pond for amenity purposes<sup>360</sup>, with Arowhenua opposing any reconfiguration of Pleasant Point stream.*

- 18 In response, we note the Pleasant Point Stream does not run all year, and is considered to be *“an ephemeral second-order watercourse as it passes through the Pleasant Point township. It has an approximate mean flow of 0.04 m<sup>3</sup>/s, and generally only flows for a short periods of time following heavy rainfall<sup>1</sup>”*. Further to this, the previously indicated “Pond” is for the purpose of stormwater attenuation and treatment, and is now anticipated to be planted out with suitable native vegetation, or as per best practice. For clarity, no amenity pond is proposed. Refer to **Appendix C: Outline Development Plan**.
- 19 Mr Bonis summarises the **Landscape** as follows: *Ms Pfluger identifies that the proposed residential zone would represent infill development ‘as long as the stream is maintained as a landform boundary for development and setbacks from the waterway are maintained for natural character reasons’ 358. She considers the amenity of the site is high and **good design outcomes** could be achieved if developed sensitively.*
- 20 We have considered the views of Ms Pfluger in the development plan attached as **Appendix C**, and draw attention to the plan Key: “Not for Residential Build Form”.
  - a) Given the further information was supplied on the 20<sup>th</sup> February 2025 as set out in (3) and (4) above, within the s.42 report Mr Bonis asked for more evidence such as; Engineering statement evidence – Ability to service and strategic planning context regarding infrastructure-related concerns.
  - b) Outline Development Plan
  - c) Colliers Pleasant Point Demographics Profile
  - d) Traffic statement of evidence, including Final Transportation Assessment

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<sup>1</sup> As taken from Council Pleasant Point Stormwater Management Plan p14  
[https://www.timaru.govt.nz/data/assets/pdf\\_file/0020/740018/Pleasant-Point-Stormwater-Management-Plan.pdf](https://www.timaru.govt.nz/data/assets/pdf_file/0020/740018/Pleasant-Point-Stormwater-Management-Plan.pdf)

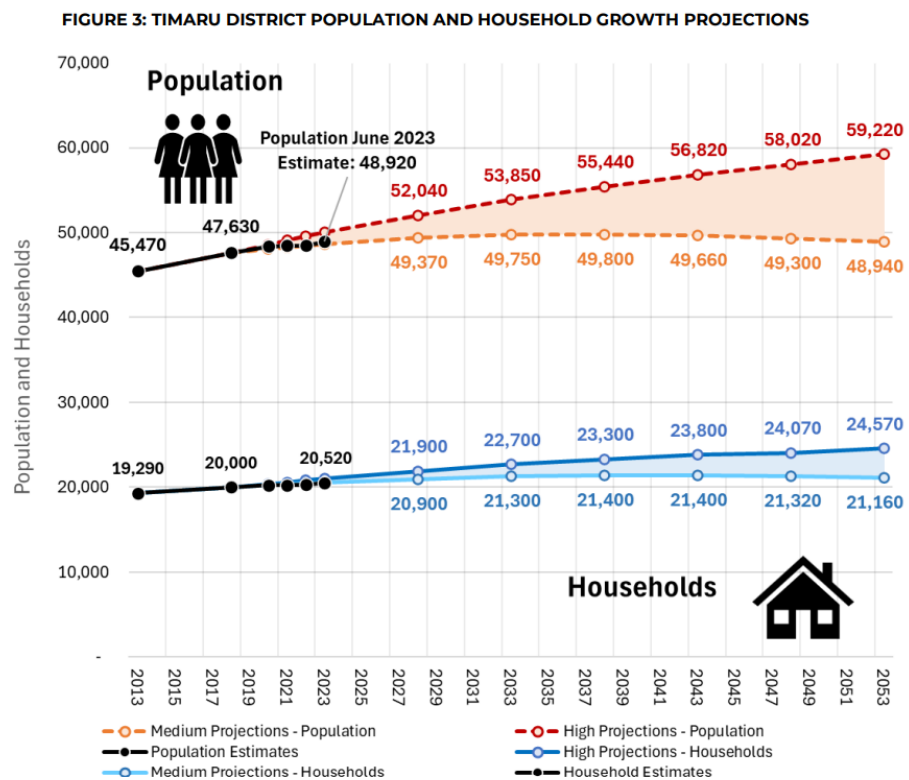
e) CRC Further comments regarding proposed development

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

**Property Economics report and modelling**

- 21 I note that Mr Bonis has been guided for any future residential zoning based on the Property Economics residential capacity report dated October 2024.
- 22 I disagree with Mr Bonis statement that the inclusion of rezoning for this site is not required for various reasons as set out below.
- 23 I note that the Property Economics report has not been peer reviewed or had a second pair of eyes to analyse the data. Based on best practice and in the interest of this modelling to quantify the metrics (for example predicting the dwelling capacity counts based on population growth), it is unclear as to what method has been used to confirm this data. The report speaks to assumptions being made, based on the medium to high population projections that have been used based on the Stats NZ projections.
- 24 I note that the Property Economics report does not consider the 75 years plus demographics and appears to lump population together. I disagree with this approach in terms of retirement village living. Residents locate to retirement living for reasons such as security, companionship, care oversight, setting up a partner for peace of mind before the inevitable, smaller housing requirements, use of community assets, shifting back to where family may be, relocating to cheaper areas to free up capital for final years lifestyle and so on.
- 25 The Colliers: Pleasant Point Demographics Profile attached as **Appendix D** will address this matter in more depth, but key findings are noted below:
  - Necessary to address projected shortfalls in aged care and retirement housing;
  - Appropriately located within an established community with good connectivity;
  - Economically viable within the local housing market and income profile;
  - Strategically valuable as the only aged-care-enabled village in Pleasant Point and surrounds.

- 26 I note that Mr Bonis throughout his 42a report in assumptions for how growth should be measured, he refers to the medium growth scenario as set out in the Stats NZ modelling population predictions. I note this is a very conservative line to take and is not in line with the current population trend as outlined further down in my evidence. Going forward, for this evidence I will reference to the high growth scenario as this is a more realistic scenario and is consistently used by other central government agencies as a baseline for population predictions.



- 27 Based on the line graph above, it is assumed that the Timaru District would plateau in its population predictions within the period of 2021 to 2025.
- 28 I note that despite the plateau population predictions, the Timaru District population has had an uptick of growth. This is due to employment opportunities, affordable housing and an attractive lifestyle. The local economy is strong and the primary industries which has demonstrated stronger economic growth will continue to provide employment and opportunities for people to relocate to the District. Based on the Infometrics website<sup>2</sup> the Timaru population has exceeded the medium projections

<sup>2</sup> Source; Infometrics website June 2025

scenario and is in line with the high population modelling forecast. For example, in 2023 alone had a population increase of 1.9% (an increase of 900).

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

- 29 Based on the high population scenario, I now turn to table 13 for dwelling capacity scenarios. Table 13 for its dwelling count predictions are based on the baseline yield of 450m<sup>2</sup> lot sizes across the District. Across the District the average residential typology size would be much larger than this. I quote the Colliers 2022 Residential Property Market Study commissioned by the Council noted on page 13; “*Of note the average land area of a vacant section is 1033m<sup>2</sup> compared to 784m<sup>2</sup> for the average house*”. Based on this, then the average yield lot size would be a more realistic **750m<sup>2</sup>-900m<sup>2</sup>**.

TABLE 13: DWELLING CAPACITY REQUIREMENTS – HIGH GROWTH

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

- 30 Table 13 demonstrates that within the high growth scenario (in line with current population growth), then Pleasant Point without the FDA allocation may not have sufficient land supply. Further, based on refined modelling with a realistic yield lot size of **700m<sup>2</sup>-900m<sup>2</sup>**, it is assumed that the dwelling deficiency would be in the vicinity of potentially having a slight deficit in its dwelling supply. The timing and sequencing of when the dwelling capacity has not been confirmed for the short, medium and long term. On that basis there is no guarantee for when land would be live zoned and thereby available for development purposes. On this basis it appears that there



potentially could be a deficit of residential zoned land and I also speak for this in my statement below.

- 31 As a Tier 3 Council, Timaru is not bound by the 15 HH/ha minimum that applies to Greater Christchurch under the CRPS. A 12 HH/ha net density assumption is both appropriate and consistent with established practice for similar-scale towns across the Canterbury region. The use of a 15 HH/ha or higher assumption in capacity modelling for Timaru overstates likely delivery potential and fails to reflect the character, market conditions, and infrastructure limitations of the district.
- 32 If Property Economics (PE) has removed 30% of gross area to arrive at net residential land, and then applied an average lot size of 450m<sup>2</sup>, then their effective density is exactly 15 households per hectare (HH/ha). Whereas it is more realistic in the context of Timaru that average yield would be 12 HH/ha (i.e. 580m<sup>2</sup>) or 10 HH/ha (700m<sup>2</sup>) (as per CRPS Policy 6.3.12) where topography or site constraints are greater. This difference being between 25% - 43% respectively. Therefore the amount of both available existing urban capacity and Future Development capacity would need to reflect this, potentially having a substantial effect on the capacity requirements.
- 33 I note that the Property Economics report states *"If Timaru were to reach its long-term high growth projection of 24,570 households, the Council would need to ensure there is capacity for almost 5,000 dwellings over the long term. This means that the current realisable capacity is sufficient to supply 80% of the requisite capacity to the market, with **the potential** shortfall being covered by Council's proposed growth areas"*. I note that this statement says that the Council's proposed growth areas has the **potential** to supply the shortfall. This also confirms that further evidence is required to ensure that there is sufficient residential land for the short, medium and long term. I recommend to the Hearing Panel that this be investigated further.
- 34 I note that the Property Economics report assumes a household number average of 2.75, and this would be factored in with the dwelling capacity predictions. I do note that Kainga Ora in their submission stated that the 117 households on the MSD's waitlist for Timaru, approximately: a) 50 per cent of demand is for a one-bedroom unit; b) 33 per cent of demand is for a two-bedroom unit; and c) 17 per cent of demand is for a three or four

*bedroom unit*<sup>3</sup>. Based on this, this would translate that the demand for housing based on a single or 2 person household, would mean that on average the 2.75 household number would be a lot smaller and therefore the dwelling count calculations could be misleading. I recommend to the Panel that this be investigated further.

### **National Policy Statement: Urban Development and Government Temporary Powers**

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

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

- 36 As far as providing future capacity across the District, I note the s32 analysis for the growth chapter *“has to consider reasonable options to justify the proposed plan provisions”*. On that premise the s.32 report noted that Planz *“recommends for the Proposed District Plan, a new Future Urban Zone to safeguard rural land for future urbanisation is provided and more intensive infill is provided in urban zones”*.
- 37 As stated in the original submission I propose that;
- a) Either the site be rezoned General Residential Zone (GRZ) or;
  - (c) Provide for a Future Urban zone (FUZ). is consistent with the National Planning Standards and also consistent with many Councils' who

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<sup>3</sup> MSD data -September 2022

have endorsed this approach (including Tier 3 Councils such as Waitomo District Council).

The national planning standards defines the FUZ as follows;

Future urban zone Areas	Suitable for urbanisation in the future and for activities that are compatible with and do not compromise potential future urban use
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- 38 The Future Urban Zone can be subject to a structure plan that would also incorporate further technical investigations. I note that Porirua City Council allocated a future urban zone framework as part of the proposed District Plan A variation to the Porirua District Plan to live zone FUZ, was subsequently endorsed 18 months post the future urban zone framework being in place.
- 39 An indicative Outline Development Plan is included as **Appendix C**.
- 40 I recommend that a Future Urban Zone be introduced with a view to the same with a variation to the District Plan once other stages of a structure plan/other infrastructure assessments are completed. The FUZ will also:
- a) Ensure that the Council is consistent with the National Planning Standards
  - b) Be consistent with the directive of other Councils
  - c) Be receptive to what the current government is pushing for to ensure that an introduced planning framework is robust and will not *“hinder economic growth, development, or employment”*.
  - d) As endorsed by many Councils I therefore recommend the FUZ as a way forward to manage the growth for the Timaru District.
- 41 I will now speak to all other matters to include;
- a) Infrastructure provision
  - b) Transport assessment
  - c) Flood risk assessment
  - d) NPS: HPL report
  - e) Outline Development Plan

## Infrastructure provision

- 42 I note that in respect to infrastructure matters, that Mr Bonis rejects the request to rezone being based on objective 6 of the growth chapter PTDP.

Objective 6 of the PDP states that *“decisions on urban development that affect urban environments requires integration with infrastructure planning and funding decisions and be strategic over the medium and long term”*.

- 43 In respect to objective 6 above, I note that coordination between the Council and providing for the infrastructure planning and funding decision could be addressed through the planning mechanism of a structure plan to enable the provision of infrastructure. Other Councils have used the same approach with a proposed future urban area zone, with a structure plan being developed within the medium to long term to ensure that development can enable the provision of infrastructure such as roads, water, wastewater and water supply. I note that the TDC Growth Management Strategy states under C:2.1 – Benefits of the GMS;

*“Targeted infrastructure costs. Servicing land use growth affects Council expenditure, which affects rates. A strategic, integrated and proactive approach to the provision of new land areas to meet demand in homes, shops and industry, with infrastructure provided proactively as and when needed means increased certainty. Both in terms of the wider community, and of the costs borne by the development community through their contributions to infrastructure provision. The Council’s expenditure is then focused towards where actual growth will occur, resulting in efficient and prudent Council infrastructure investment”*.

- 44 In summary of the above from the GMS is implicit that servicing land use growth will occur. Along with the provision of the infrastructure, the client accepts that the infrastructure upgrade costs may need to be paid at their cost. However, for any upgrade that occurs that may result for overall public benefit then accordingly these costs should be shared between Council and the developer. As far as the reference to the Long Term Plan, the allocation for the LTP is one that can be done iteratively every 3 years, and once the structure plan has been approved, the funding mechanism can be allocated within the LTP accordingly.

- 45 Further to the statement above, Selwyn Chang, a qualified Civil Engineer has provided an engineering statement of evidence as attached in **Appendix B** He will speak on the client's behalf.

In his summary;

- (a) The site at 10 Burke Street is technically feasible to service for water, wastewater, and stormwater, subject to detailed engineering design, modelling and consenting processes.
- (b) All new servicing infrastructure within the site will be funded and constructed by the developer, and no development will proceed until network capacity is confirmed and all relevant regulatory approvals are secured. Any infrastructure extensions outside of the site will be subject to agreement with Council; funded by the developer and where applicable cost shared if public benefit can be demonstrated and agreed with Council (i.e. in accordance with Councils Financial Contribution provisions).
- (c) He recommends the site can be rezoned as Future Urban Zone (FUZ) with infrastructure-related triggers, to enable timely, staged manner aligned with verified servicing capacity and consenting requirements.

#### **Transport assessment - traffic related effects**

- 46 A statement of evidence from Andy Carr, a director of Carriageway Consulting Limited and a Chartered Professional Engineer with a practice field of Transportation Engineering, is attached in **Appendix E**

- 47 Mr Carr rebuts the findings of the s42A report, commenting:

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

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

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

#### **Flood risk assessment**

49 Mr Bonis, in his s42A report states: The amending proposal would not achieve and implement Objective NH-O1 or be the more appropriate in achieving Policy NH-P4.

50 In regards to Objective NH-01, Andrew-Willis-s42a-report-Appendix-1-Recommended:

- NH-O1 Risk to human life and significant risk to property, from natural hazards is:
  1. avoided in high hazard areas that are outside of urban zoned areas;
  2. avoided or mitigated in high hazard areas that are within urban zoned areas; and
  3. avoided or mitigated elsewhere in all other areas to an acceptable level.

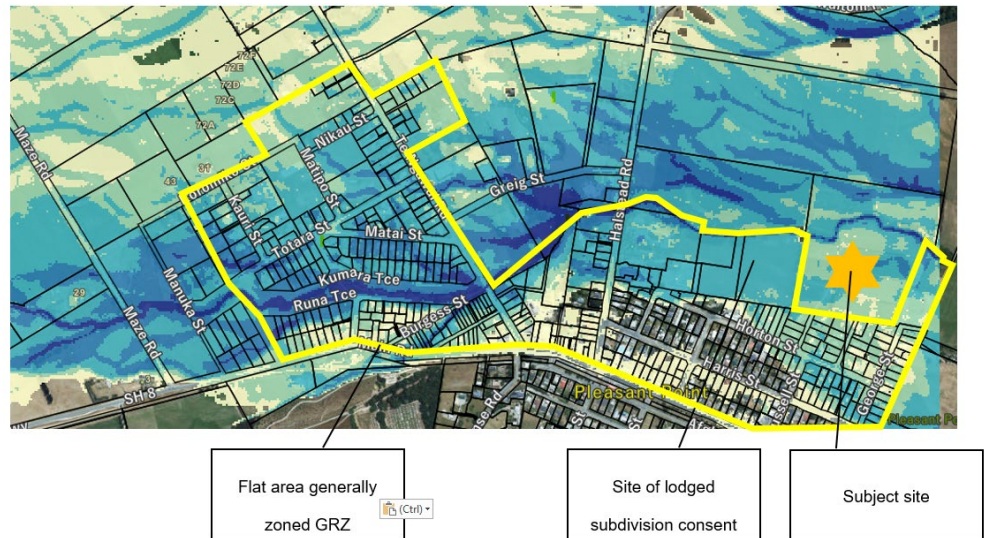
51 Mr Bonis states in relation to Policy NH-P4: *"Whilst the criteria contained within Policy NH-P4 could provide for some development on the balance of the subject area as subject to inundation by a 0.5%AEP flood event (200 ARI), there is insufficient information provided as to whether necessary works, including earthworks would impact on functioning of the floodplain (Clause 2); the likelihood of significant damage in a flood event (Clause 1),*

- 52 We note a 27-allotment residential subdivision has recently gained CRC consents immediately adjacent to the subject site on the western boundary (16 Horton Street), being: CRC240809, CRC240810 and CRC240811. This demonstrates although flooding is a consideration, through liaison with Regional Council a consenting pathway is achievable.
- 53 Site specific feedback has been obtained from CRC and this is attached as **Appendix F**. Based on the concept plan at the time of contact with ECAN, key points have been summarised below:
- 54 *“Generally I don’t see any significant issues with the design at this stage, low ground appears to have been avoided which aligns with the comments that were made in Assessment 22104 and I still consider those comments to be relevant. Namely that residential development will require elevation of the floor levels of any dwelling, though the degree of this will vary across the site and be reliant, to some degree on what ground levels on the site look like following development.”*
- We note feedback was based on an earlier iteration of concept plan. Feedback from CRC has been considered and no residential built form is proposed within high hazard areas, immediately adjacent to the Pleasant Point Stream, or north of the Pleasant Point Stream.
- 55 I consider this addresses concerns regarding Policy NH-P4 and Objective NH-01.

#### **NPS: HPL**

- 56 An assessment against relevant provision Clause 3.6 was provided in our previous response, which summarised the site was able to be rezoned by the Timaru District Council.
- 57 I also consider Clause 3.6(1)(b) to be relevant:
- **(b) There are no other reasonably practicable and feasible options** for providing the required development capacity
- 58 The site is a large, cohesive, flat land holding, unfragmented and with connections to the urban township. Within the Pleasant Point township, there are no other sites that may be considered to meet these requirements.

- 59 We additionally note, when looking at the CRC flood modelling, that the subject site is considered to have less flooding than other sites on the flat. Refer to image below:



- 60 The proposed landuse (aged care) is typically not suitable for sites other than that of a generally flat topology.
- 61 Detailed flood modelling is able to be completed with CRC as part of the refinement of the Outline Development Plan.
- 62 In regards to capacity, we draw attention again to the supporting evidence from Colliers in **Appendix D**.

### Outline Development Plan


- 63 I enclose an outline development plan in **Appendix C**. The ODP confirms the site is able to be developed for residential purposes, and considers the natural hazards and servicing requirements. Detail is able to be worked through with Council as part of expert caucusing for rezoning, or development of a Structure Plan (or similar) for a FUZ.

### Overall conclusion

- 64 I seek that the site be rezoned to General Residential Zone (GRZ) or be rezoned to Future Urban Zone (FUZ).



- 65 I consider that the matters raised by Mr Bonis namely have been addressed namely the infrastructure constraints, flood risk effects, traffic effects and in relation to matters of the NPS:HPL.
- 66 I recommend that the Property Economics report be peer reviewed, the data be reanalysed to ensure that there is sufficient residential capacity for the short, medium and long term.
- 67 I recommend that a Future Urban Zone be introduced with a view to the same with a variation to the District Plan once other stages of a structure plan/other infrastructure assessments are completed.
- 68 Finally, Mr Bonis raised the statutory framework points "*would not promote a 'coordinated pattern of development' to give effect to CRPS Policy 5.3.1 and would not better achieve 'a consolidated and integrated settlement pattern' as sought by UFD-O1*". Having addressed the points as per above in the evidence, and attaching the various supplementary expert reports and evidence, I am of the view that the rezoning "*would achieve the coordinated pattern of development and give effect to CRPS Policy 5.3.1*" and would achieve '*a consolidated and integrated settlement pattern' as sought by UFD-O1*".



**Sonia Dolan**

**Date 27<sup>th</sup> June 2025**