



Timaru District Council
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Timaru 7910
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Further Submission in Support of, or in Opposition to the Proposed Timaru District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

Further submissions close on Friday 4 August 2023 at 5pm

To: Timaru District Council

This is a further submission in support of, or in opposition to, a submission on the **Proposed Timaru District Plan**.

Full name of person making further submission:

John L. Shirtcliff & Rosemary J. Shirtcliff

Organisation name and contact (if representing a group or organisation):

[Click to enter text.](#)

Only certain persons can make a further submission. Please select the option that applies.

I am:

- a person representing a relevant aspect of the public interest;
- a person who has an interest in the proposal that is greater than the interest the general public has;
- the local authority for the relevant area.

Please explain why you come within the category selected above:

Our land is directly affected by the PDP and we have already provided a submission that requires further support and clarification

Hearing options

I wish to be heard in support of my further submission? Yes No

If others make a similar further submission, I will consider presenting a joint case with them at a hearing.

Yes No

Signature: J Shirtcliff

Date: 11th August 2023

(of person making submission or person authorised to make decision on behalf)

PLEASE NOTE - A signature is not required if you submit this form electronically. By entering your name in the box above you are giving your authority for this application to proceed.

Electronic address for service of person making further submission: john.shirtcliff@xtra.co.nz

Telephone: +6421474334

Postal address (or alternative method of service under section 352 of the Act): 584 Orari Station Rd,
RD 22, Geraldine

Contact person: *[name and designation, if applicable]:* John Shirtcliff

You have served a copy of the further submission on the original submitter (this is required under the Resource Management Act 1991 Schedule 1, s8A(2) to be completed within 5 working days after it is served on the Timaru District Council)

Yes No

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Telephone: +6421474334

Postal address (or alternative method of service under section 352 of the Act): 584 Orari Station Rd,
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Contact person: *[name and designation, if applicable]*: John Shirtcliff

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Yes No

This further submission is in support of:

Submitter	Submission Number
J.L. & R.J. Shirtcliff	81
J.& L. Badcock	85

This, further submission, is in support of our original submission regarding the proposed zoning for our property at 584 Orari Station Rd, Geraldine.

As requested in Point 1 of that submission, we consider that a portion of the lands to the south of Raukapuka Stream would be better rezoned for residential use (GRZ) rather than rural lifestyle (RLZ) as presently proposed.

It is apparent that, in addition to several other submissions made, the proposed allocation of land, both GRZ and RLZ, to future development is likely to be inadequate in accommodating the future growth of the Geraldine settlement.

There is significant anecdotal evidence available that supports this contention but, importantly, there is available statistical evidence that demonstrates that the growth projections underlying the planning assumptions for future population and dwelling requirements are significantly flawed for Geraldine.

The evidence demonstrates that Geraldine’s population is already at or above the level forecast for 2048.

The 2048 projection¹ for the Geraldine population is 2710 – the 2018 census population for the Geraldine statistical area unit was 2706.

It is immediately apparent that the true nature and quantum of growth of the Geraldine settlement has not been identified. The growth of Geraldine differs significantly from the experience of the settlements within the wider Timaru District taken as a whole. Geraldine is clearly growing at a faster rate than other settlements within Timaru despite the restrictive approach taken under the present operative district plan. Neither have the 2022 reports prepared by PLANZ or Property Economics identified or addressed the unique growth profile presented by the Geraldine settlement.

We consider that reliance upon such fundamentally flawed projections, when used as the foundation in supporting the proposed planning provision of future lands, will necessarily have resulted in incorrect conclusions.

At the 2018 Census, Statistics NZ figures reveal that the Geraldine settlement had already grown to about the level of the GMS 2048 projection. Worse, these projections are even more astray when the population and growth of the areas immediately adjacent to the Geraldine Statistical Area unit (i.e., the “traditional” town boundary geography) are taken into consideration in a more complete definition of the Geraldine settlement to include the mesh blocks immediately contiguous to the area unit and where significant development and growth have occurred. A full discussion and presentation of the statistical analysis is presented below.

As the assessments made in the PDP for the Geraldine settlement’s future requirement for lands correctly zoned to accommodate future demand and growth are apparently based upon flawed figures and

¹ Timaru Growth Management Strategy p.78 [Growth-Management-Strategy-Adopted-Low-Resolution-08052018.pdf \(timaru.govt.nz\)](https://www.timaru.govt.nz/assets/Uploads/Growth-Management-Strategy-Adopted-Low-Resolution-08052018.pdf) accessed 11/8/23

associated assumptions, it seems inescapable that the planning conclusions will be wrong and therefore that insufficient future land will have been allocated to meet the long-term needs of the settlement.

The settlement of Geraldine is largely surrounded by productive land, now addressed by the National Policy Statement for Highly Productive Land 2022 (NPS-HPL). That policy imposes an obligation to avoid or minimise the loss of such land in accommodating settlement growth. The NPS-HPL will be rather more restrictive upon the future provision of RLZ lands when the mapping of productive lands is completed, as mandated, within 3 years of the imposition of the NPS-HPL, and when policy 3.10 of the policy will be fully effective.

However, the obligation to provide sufficient land to accommodate growth is imposed by the National Policy Statement on Urban Development 2020 (NPS-UD) and, in particular, Policies 1, 2 and 8.

The consequent tension, arising between these two NPS documents, will require a judicious approach to be taken in any zoning decisions which will inevitably necessitate expanding the settlement of Geraldine into highly productive lands. Any GRZ expansion into productive lands is to be in accordance with Policies 3.6(4) and 3.6(5) of the NPS-UD and 3.10 of the NPS-HPL.

Neither NPS requires that the future development of settlements be stifled – quite the reverse is the case as it is made incumbent upon local authorities to provide sufficient development capacity at NPS-UD Part 3. It is clear, however, that future allocation of rural land to urban or rural lifestyle uses will be more challenging due to the apparently conflicting objectives.

It is, therefore, critically important that this PDP maximise the potential for urban development and a greater intensification within the RLZ lands, already proposed, by permitting discretionary relaxation of the 5000m² minimum size of allotments and providing further GRZ lands.

It may well emerge that future governments recognise the tension created by these NPS promulgations to ameliorate the particular challenge that will be faced by settlements located within highly productive settings, however, that is not the present position.

The particular circumstances and evidence leading to the above conclusions and submission are discussed below.

The effluxion of time

The district planning process has been a long and drawn-out affair, now, some eight years past the intended lifetime of the current District Plan, and, as a consequence, a number of the original baseline assumptions may have become obsolete.

In summary:

1. the existing District Plan (DP) was implemented in 2005 with an expected statutory 10-year lifetime (i.e., end-of life 2015).
2. Planning processes commenced with the publication of the Issues and Options Paper in 2015.
3. The Growth Management Strategy was not completed and adopted until 2018 and based upon the 2017 population projection statistics provided by NZ Statistics.
4. The PDP was released for submissions in December 2022 and seems unlikely, at the present pace, to be implemented in its final and complete form before 2024.

5. It is unlikely that assumptions, whether accurate or not, made some eight years ago will continue to be valid due to a variety of factors.

Growth projections

In response to our original submission², responding to the GMS, in which we raised the inherent inaccuracy of the population statistics for Geraldine and the necessarily doubtful reliability of the population projections based upon those assumptions: - council officials responded as below:

“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.”³

We can find no reference in the relevant and current NPS documents (either Urban Development or Highly Productive Land) imposing any statutory obligation or otherwise upon TDC to particularly rely upon the projections provided by Statistics New Zealand Medium Series projections for growth profiles referred to in that document.

We regard it as simplistic to cleave to the expert opinion provided by Property Economics and reject a well-researched alternative opinion. Analysis of census data and ground-truthing of assumptions demonstrates the errors of judgement that may arise by projection of Statistics NZ national data sets onto a smaller and, perhaps, atypical community such as Geraldine.

We consider that Council was in error to dismiss our submission in this respect – the opportunity to redress that error is now available.

² [GMS Submission #21 Insights Consultancy.pdf-20170526115532 \(timaru.govt.nz\)](#)

³ Timaru District Draft Growth Management Strategy: Consultation Review, Nov 2017 at p 17.

The Geraldine projections and assumptions

Dwellings

We note that the 2018 census, of occupied dwellings in the Geraldine Area Unit (SA2 aggregation), reveals that occupied dwellings increased at a rather faster rate than the GMS predicted – an additional 161 to year 2045⁴.

	2006	2013	2018	2023 (est)	2045 (proj)
Interval (yrs)		7	5	5	22
Dwellings (occ.)	1029	1101	1179	1258	1262
Growth (no.)		72	78	79	4
%age growth		7.0%	7.1%	6.7%	0.3%

Figure 1: Geraldine town boundary SA2 growth in occupied dwellings⁵

It is self-evident that the projections and estimates upon which the GMS Geraldine discussion is based are grossly inaccurate – that is to say that Geraldine is almost at the projected 2045 dwelling requirement already, with a further 22 years remaining to achieve an additional 4 dwellings. **Since the 2018 census it is understood that a further 79 new dwellings have already been constructed within the Geraldine area unit.**⁶

The 2018 census count for occupied dwellings, when considered in conjunction with the immediately contiguous peri-urban mesh blocks, increases to 1,548 showing the Geraldine community growing at 10% in the intercensal period.

Population

This finding is further borne out by Statistics NZ figures reporting the intercensal change in the usually resident Geraldine population revealing that population to have increased from 2,400 at the 2013 census to 2,706 in 2018⁷ (12.8% growth). **Thus, the population of the Geraldine township (SA2 Area Unit) was, in 2018, already and incontrovertibly at the level forecast for 2048**⁸ - and this prior to considering the considerable peri-urban growth (informal additions to the settlement) in the immediately adjoining and contiguous mesh blocks covering such areas as the Geraldine Downs and the newly-constructed Retirement village houses. Much of the peri-urban area has a closely-settled character and is directly connected to the Geraldine township by roading and walkways. At an average occupancy of, say, 2.2 per dwelling, the additional 79 houses, referred to above, will have added an additional 174 people to the 2018 figure taking the Geraldine township population to at least 2,900 currently.

⁴ GMS p 78

⁵ Statistics NZ: [Change in occupied and unoccupied dwellings between the 2013 and 2018 Censuses \(arcgis.com\)](#)

⁶ Council email communication to Clr Oliver 6/7/23

⁷ Statistics NZ: [Population change between the 2013 and 2018 Censuses \(arcgis.com\)](#)

⁸ GMS F5.1 p 78



Figure 2: Geraldine Population 2018 Census

Figure 2 (above) maps, the peri-urban mesh blocks and for the SA2 Geraldine area unit, the spatial distribution of the 2018 population Census statistics.

In the most recent intercensal interval, Timaru District grew the usually resident population from 43,932 (2013) to 46,296 (2018) – an increase of 2,364 or 5.4% growth (Geraldine 12.8%). Similarly, occupied dwellings grew from 18,423 (2013) to 19,194 (2018) an increase of 771 or a growth rate of 4.2% (Geraldine 7.1%).

A further (inescapable) conclusion is that Geraldine is growing at a rather faster rate than is the Timaru District as a whole.

There is considerable anecdotal evidence of excess demand for land and modern housing from people seeking to move to Geraldine (for both retirement and work/life balance reasons) and it is likely that, had sufficient land been made available and development permitted, growth in Geraldine would have greatly exceeded both the projections and actual rate of growth. There are, for example, already some 25 sections under sale contract in the new Majors Rd subdivision. Clearly, when built upon, these sections will eclipse the 2045 projections relied upon within the GMS.

This extraordinary situation is the consequence of not robustly testing the basis for assumptions and the accuracy of the various reports and desktop estimates by “ground truthing”. A more pragmatic and transparent approach would permit challenge to the opinion and “received wisdom” of the “expert” planning industry by being receptive to soundly based “inexpert” evidence-based opinion to the contrary.

A dangerous reliance upon the, now outdated, Geraldine “town boundary” (constituting the SA2 Geraldine area unit) has further hampered the provision of accurate planning forecasts and growth, creating a self-fulfilling prophecy, by ignoring the real residential growth occurring adjacent to that boundary. The Geraldine settlement has, simply put, outgrown its traditionally meaningful boundaries and the real rate of growth has not been detected by those tasked with the provision of useful forecasting.

It is noteworthy that Statistics NZ have earlier acknowledged the shortcomings of the Geraldine statistical base and have responded by establishing 3 new mesh blocks at the Northern end of Geraldine, from the previous mesh block 2759300, for the 2023 Census.

Conclusion

We offer this further submission in support of our original submission and the several Geraldine submissions (listed above) advocating for additional residential land (GRZ) and rural lifestyle land (RLZ) to be zoned in order to facilitate the settlement’s continued growth and development in response to demonstrated demand long term trends. Not only are additional lands required to accommodate the further growth in the settlement’s population and additional modern housing associated with that growth, but also to better support the economic scale, viability, and diversity of Geraldine’s commercial and retail activity. This will be particularly important in assisting the retail sector of Geraldine to cope with the looming rebuilding costs that will be associated with the implementation of the earthquake regulations.

We submit that the portion of our land to the south of Raukapuka Stream would be better zoned for residential use (GRZ) or for RLZ use (as presently proposed) but with a greater density and, therefore, a smaller allotment size than 5000m² to be permitted as a discretionary activity.

We consider that the provision of rural lifestyle zoned (RLZ) land should be amended to permit the discretionary reduction of allotment size below 5000m² in order to maximise the use of RLZ lands (resulting from implementation of the PDP) and in mitigation of the adverse effects accruing due to the possible attendant loss of additional productive lands. This will permit more efficient development within the RLZ but will also be less likely to fatally hamper future intensification of the RLZ in future periods beyond the present contemplation of the PDP.

We request that the PDP to be modified to provide more efficiently and effectively for the longer-term growth of the Geraldine settlement by providing sufficient GRZ and RLZ lands to achieve the objectives of the NPS-UD whilst mitigating the loss of productive land as required by the NPS-HPD.