

Before the Independent Hearings Panel  
Appointed by the Timaru District Council

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**Under** the Resource Management Act 1991

**In the matter of** a hearing on submissions made on the proposed Timaru District Plan: Hearing G (Growth: Future Development Areas, Rezone request for growth).

On behalf of **Glenys and John Travers**

Submitter ID: 272

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**Statement of evidence of Jessica Lucy Bould**

27<sup>th</sup> day of June 2025

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### **Introduction, qualifications and experience**

- 1 My full name is Jessica Lucy Bould. I hold the qualifications of a Bachelor of Environmental Policy and Planning and a Postgraduate Diploma in Resource Studies, both from Lincoln University. I am a full member of the New Zealand Planning Institute.
- 2 I have 13 years' experience in the field of resource management planning, primarily as a planning consultant based in Christchurch. My practice has included work for local authorities, central government agencies, private companies and private individuals, primarily as an independent planning consultant. My experience to date includes preparation of resource consent applications, preparation of submissions and further submissions on plan review process.
- 3 I currently hold the position of Senior Planner at Town Planning Group where I have been employed since May 2025. My previous experience includes holding senior planning positions at multi-disciplinary consultancies, infrastructure providers and local government.
- 4 In my current role (and immediate past role) as a planning consultant, my experience includes providing planning advice to clients with respect to land development, plan changes and applying for resource consents. I am familiar with the operative and proposed Timaru District Plans, having worked with them on a number of occasions in the past.
- 5 I have been engaged by Glenys and John Travers (**the Travers'**) to provide expert planning evidence in relation to the Travers' further submission on the Proposed Plan. I did not assist with the preparation of the original further submission on this plan review. I have reviewed the original further submission in full.

### **Code of Conduct for Expert Witnesses**

- 6 I acknowledge the Hearing Panel's directions in Minute 6 (at [36]) and confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I further confirm that I have complied with the Code of Conduct when preparing my evidence and will do so when giving oral evidence or otherwise participating in this hearing.
- 7 Other than when I state I am relying on the advice of another person, the 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.

### **Scope of evidence**

- 8 The Travers' further submission expressed support to Submissions 203, 216 and 211 (the **original submissions**) and the relief sought, summarised as follows:

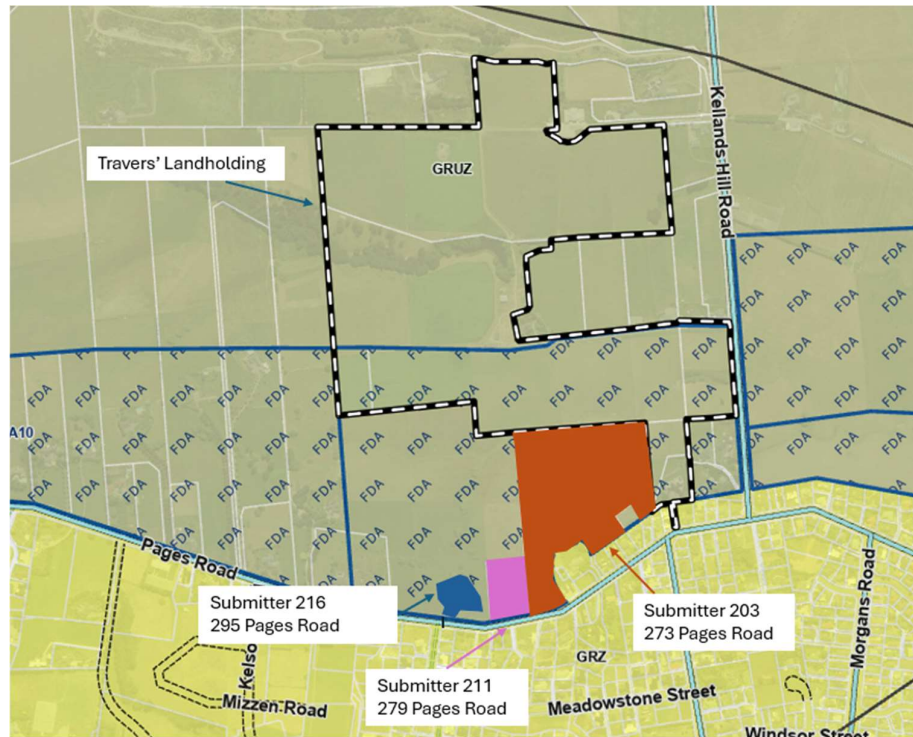
- a. Rezone specific land parcels to General Residential.
  - b. Amend the sequencing of the FDA2 Overlay to allow for development within 2 years instead of a 5-year timeframe,
  - c. Deletion of 'additional requirement' in Schedule 15 for the development area plan to be developed in conjunction with Kellands Height West.
  - d. Consequential amendments required to the address the above relief and/or to ensure a coherent planning document was requested.
- 9 I have been asked to provide planning evidence in regard to the Travers' further submission, and specifically to consider whether a minor extension to the FDA2 overlay to align with property and landholding boundaries would increase the coherence of the FDA2 overlay in the vicinity of the Travers land and original submissions supported by the Travers' further submission.
- 10 My evidence does not address any rezoning of land to general residential, nor matters relating to sequencing of development within the FDA2 overlay, nor concurrence of development with Kellands Height West.
- 11 My evidence will address the following:
- a. The Site and existing environment;
  - b. The proposed consequential amendment to FDA2 Overlay (**the request**);
  - c. The s42A report and recommendations; and
  - d. Assessment of the appropriateness of the request in accordance with Section 32AA of the RMA.
- 12 In addition to the documents referred to above while preparing my evidence, I have reviewed the following documents:
- a. The proposed Timaru District Plan (PTDP);
  - b. The National Planning Standards;
  - c. The National Policy Statement on Urban Development 2020 (NPS-UD);
  - d. The National Policy Statement on Highly Productive Land 2022 (NPS-HPL)
  - e. The Growth Management Strategy 2022 (GMS 2022);
  - f. The s32 evaluation for Future Development Areas; and
  - g. the relevant primary submissions and further submissions.

### Summary of Evidence

- 13 The Request is to consider whether a minor extension to the FDA2 overlay to align with property and landholding boundaries would increase the coherence of the FDA2 overlay included in the PTDP.
- 14 The Request is responsive to the growth objectives of the Timaru district urban environment. The Site is located adjacent to the notified FDA2 overlay, adjoining Timaru's existing urban boundary, in an area where there is an increasing demand for residential development.
- 15 I consider that the Request will increase the potential development capacity provided by the FDA2 overlay in a suitable location close to the Timaru urban area, enable more cohesive development of three larger contiguous landholdings, and reduce the likelihood of a development 'hole' forming between the Timaru urban area and existing rural lifestyle properties.
- 16 I have assessed the Request against the requirements of s32AA of the RMA and the higher order planning documents.
- 17 Overall, I consider that the Request is the most appropriate outcome for the Site and is the most efficient and effective means of achieving the purpose of the RMA, the relevant objectives of the PTDP and other relevant statutory documents.

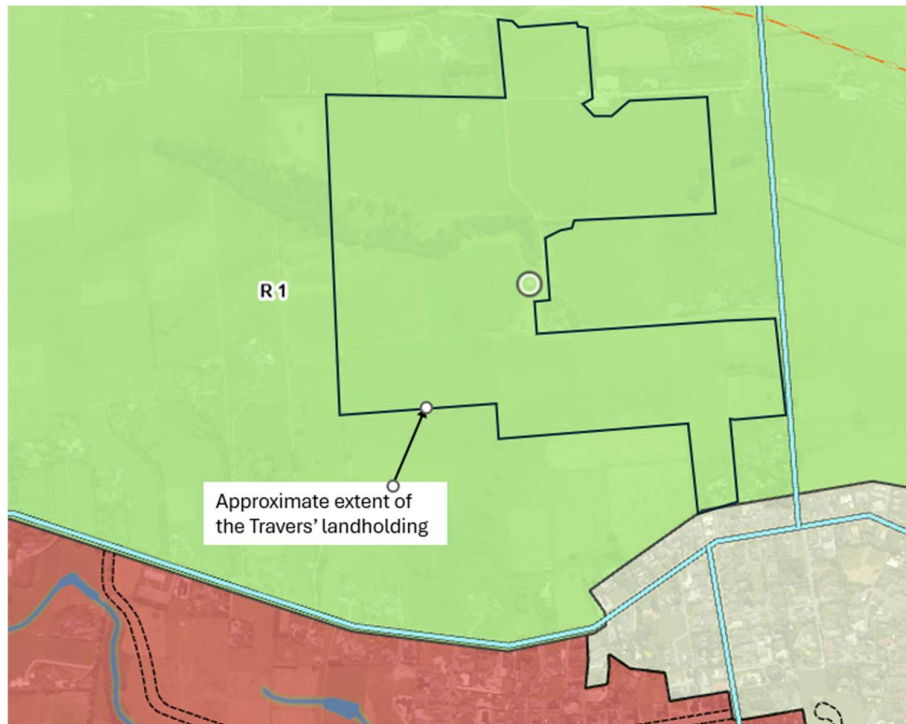
### The Site, existing environment and proposed FDA2 Overlay

- 18 The Travers' own land legally described as Lot 4 DP 75780, Lot 1 DP 300793, Lot 2 DP 313487, Lot 2 DP 76504, Lot 3 DP 422339 and Lot 2 DP 500037 (**the Site**). The location of this land along with the original submissions supported by the Travers' further submission is shown in **Figure 1** below.



**Figure 1:** Travers' landholding (black/white outline), FDA2 Overlay and neighbouring submissions.

- 19 The Site is approximately 40.7886 hectares in area. The Site is currently undeveloped farmland and located on the northern urban boundary of Timaru. There are a mixture of residential properties and lifestyle properties immediately adjoining the site or adjacent to the site.
- 20 The Site topography is naturally rolling hills. A small pond is located within the Site as well as the upper tributaries of Taitarakihi Creek. The tributaries are located within a natural low point between the rolling hills.
- 21 The Site is zoned Rural 1 under the operative Timaru District Plan. Land to the south is a mixture of Residential 1 and Residential 6 zoning as shown in Figure 2.



**Figure 2:** Travers' land under the operative Timaru District Plan

- 22 Under the PTDP, the site is subject to General Rural zoning (**GRUZ**) with an overlay pertaining to Future Development Area 2 (**FDA2**). Land to the south is established residential areas, with the underlying zoning being General Residential Zone (**GRZ**).
- 23 The FDA2 Overlay covers a portion of the Site, with Lot 3 DP 422339 being partially included and Lot 2 DP 500037 being fully excluded. Lot 2 DP 76504, Lot 2 DP 313487, Lot 1 DP 300793 and Lot 4 DP 75780 all being fully included within the FDA2 overlay, resulting in approximately 14.189 ha of Travers' land holdings is located within the FDA2 overlay.

### Relief Sought

- 24 The primary relief sought is a minor extension to the FDA2 overlay to include the Site described above, to align with property and landholding boundaries.
- 25 The Travers' further submission is in support of other relief sought by the original submissions, including rezoning from general rural to general residential. As discussed above at paragraph 10, this is not in the scope of my planning evidence.
- 26 **Figure 3** shows the area where the extension to FDA2 is requested. The land parcels within **Figure 3** include the remaining portion of Lot 3 DP 422339 and Lot 2 DP 50037 in its entirety.



- 30 Further assessment of the site's characteristics will be carried out at the Plan Change stage; however, based on the current characteristics, there are no immediately apparent physical limitations which would indicate that the site is unsuitable for the FDA2 overlay and potentially long-term urban development.

### **Development Capacity**

- 31 Applying the FDA2 Overlay to the Site provides an opportunity to further investigate development capacity on the northern urban boundary of Timaru. The Site is a large landholding, a total of 40.7886 hectares. As proposed, 26.6 hectares of this landholding has not been included in FDA2, which would provide for greater capacity within an area that has been identified for future growth.
- 32 The Travers have commissioned a concept study on development capacity which identifies opportunity for a residential yield between 307 – 425 residential sites. The development concept is included in Attachment A of my evidence, and demonstrates how development could occur in a cohesive manner with the remainder of the FDA2 overlay.
- 33 The inclusion of the Site adds potential development capacity that provides a buffer under the high growth scenario, presented in the Economic Memorandum, dated 29 May 2025 prepared by Mr Heath, resulting in total capacity exceeding projected sufficiency. These projections assume that all FDA areas will be fully developed to meet the anticipated capacity targets—an outcome that may not be realistically achievable. For instance, some FDA areas consist of numerous smaller landholdings with multiple owners, which can complicate the coordination of development layouts and timelines.
- 34 The FDA identifies suitable land for future development but does not seek to rezone, rather it provides for a separate assessment process to occur through a plan change process. Inclusion of the full Site within the FDA2 boundary enables integrated development of the Site.

### **Urban Form**

- 35 The Site is located adjacent to general residential land to the south and lifestyle residential properties to the north and west. Residential development is further anticipated to the west by the FDA10 overlay and FDA 1 and 4 to the east, as notified.
- 36 The Site is a large landholding which is surrounded by existing lifestyle block development. I have reviewed property maps for land surrounding the site and make the following observations:



- (a) All landparcels adjoining the site and in the immediate vicinity are approximately 10ha or less.
  - (b) Immediately north of the Site are several rural lifestyle blocks which range from 1 – 2 hectares in size. The remaining two blocks to the immediate north are 10ha.
  - (c) Between the Site and Kellands Hill Road (to the east) all landparcels are smaller than 2 ha.
  - (d) To the west of the site are a mix of lot sizes ranging between 2ha – 10ha.
- 37 In my opinion, the size of the land parcels within the Site is an outlier in the immediate environment. Retaining the FDA2 boundary in its current location may create an adverse outcome whereby there is a development 'hole' between land developed under the FDA / rezoning process to the south, and the existing smaller landparcels to the north and east.
- 38 The FDA anticipates rural lifestyle and residential development with the distribution of lot sizes being a matter to be determined through a rezoning process. If the boundary of the FDA is left as is, there is an opportunity lost for a more efficient and cohesive development to occur and potential adverse effect arising from the isolation of the Travers' larger land parcels, notably Lot 3 DP 422339 which is partially captured within the FDA2 overlay and Lot 2 DP 500037 which is fully excluded.
- 39 I consider that if the FDA2 overlay is retained as notified, that there is a potential adverse effect of isolated land being developed in a piecemeal and inefficient manner, leading to potential adverse effects on urban form, servicing demands and cohesiveness of development.

### **Highly Productive Land**

- 40 The Site is classified as Land Use Classification (LUC) 3 category, and I have considered whether the provisions of the NPS-HPL are relevant.
- 41 I have reviewed the Planz Memo, dated 21 January 2025 in relation to the applicability of the NPS-HPL to proposed re-zonings, specifically Paragraphs 22 – 24, relating to Future Development Areas.
- 42 I agree with the position taken in the Planz Memo as the FDA overlay is not a request to rezone land and therefore is not directly captured under Clauses 3.6 and 3.7 of the NPS-HPL and are therefore not technically triggered.

### **Servicing and infrastructure**

- 43 Servicing and infrastructure provisions are more suitably addressed through the DAP and plan change process. In my opinion, the extension of the FDA2 Overlay does not result in an effect on servicing and infrastructure as the FDA2 Overlay is a tool to enable further investigation.

### **Positive effects**

- 44 The positive effects are generally set out in the sections above. For completeness, I have a summarised the positive effects as follows:
- (a) Providing for a more cohesive urban form through not leaving a large landholding between the FDA and existing small size lifestyle block development.
  - (b) Providing additional development capacity in a suitable location, adjacent to existing development.
  - (c) Enables an integrated development approach in regard to three larger land areas, further contributing to development capacity.

### **S42A Report and Recommendations**

- 45 In his analysis relating to the land rezoning requests made in Submissions 203, 216 and 211, Mr Bonis indicates further information is needed to support a change in zoning request. The conclusion is there are fundamental elements that are required to be addressed but should be addressed in the context of the wider FDA rather than limited to the properties specified in Submissions 203, 216 and 211.
- 46 Mr Bonis concludes the rezoning request made by Submitters 203, 216 and 211 would be less appropriate in terms of providing opportunities for an integrated and connected roading and infrastructure network. Mr Bonis reconfirms the Council commitment to funding the DAP for FDA2 and reiterates the FDA2 Overlay provides a pathway for a plan change process where the matters set out should be addressed further.

### **Resource Management Act – s32AA**

- 47 Section 32AA(1)(a) of the RMA requires a further evaluation in respect of the amendments sought to the existing Request since the section 32 evaluation was completed. Section 32AA(1)(b) states that the further evaluation must be undertaken in accordance with sections 32(1) to (4), while section 32AA(c) requires that the level of detail must correspond to the scale and significance of the changes.

- 48 Section 32(1)(a) requires that an evaluation must examine the extent to which the objectives of the Request are the most appropriate way to achieve the purpose of the RMA. No alterations are proposed to the PTDP Objectives and in accordance with section 32AA(1)(a), no evaluation of the existing Objectives is required.

*Proposed Timaru District Plan Objectives and Policies*

- 49 Section 32(1)(b) requires examination of whether the proposed extension to the FDA2 overlay is the most appropriate way of achieving the District Plan objectives. These are assessed in **Table 1** below.

**Table 1** Assessment of Request against PTDP Objectives

PTDP Objective <sup>1</sup>	Assessment
<p><b>SD-O1 Residential Area and Activities</b></p> <ul style="list-style-type: none"> <li>i. There is sufficient residential development capacity in existing and proposed urban areas to meet demand and household choice, provided through: <ul style="list-style-type: none"> <li>a. the use of existing zoned greenfield areas;</li> <li>b. a range of densities in existing urban areas; and</li> <li>c. higher residential densities in close proximity to the Timaru and Geraldine town centres, and Highfield Village Mall;</li> <li>d. the new General Residential Zoned areas.</li> </ul> </li> <li>ii. limited rural residential development opportunities are provided where they concentrate and are attached to existing urban areas, achieve a coordinated pattern of development and are capable of efficiently connecting to reticulated sewer and water infrastructure; and</li> <li>iii. limited residential opportunities are maintained in existing rural settlements, subject to adequate servicing.</li> </ul>	<p>The additional landholding offers the potential to expand development capacity next to the urban boundary, benefiting from convenient access to existing infrastructure networks and supporting a coordinated pattern of growth. Excluding the Site from the FDA overlay could create a rural gap between surrounding residential and rural lifestyle areas, potentially resulting in unintended consequences due to fragmented development.</p> <p>The Request will enable further analysis of the FDA2 Overlay area and what this area is able to provide in respect to household typology. Extension of the FDA2 Overlay across the landholding may also provide opportunities for established rural lifestyle lots to form part of a coordinated pattern of development and integrate with urban areas.</p>
<p><b>UFD-O1 Settlement Patterns</b></p> <p>A consolidated and integrated settlement pattern that:</p>	<p>The Request is located next to established residential and rural lifestyle areas, highlighting its suitability for future residential development and supporting future growth. Additionally, a portion of the landholding is captured within the FDA2 overlay, indicating this area is identified as having</p>

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<sup>1</sup> The versions of the Objectives cited are those available on the Proposed Timaru District Plan e-plan notified 22 September 2022.

PTDP Objective <sup>1</sup>	Assessment
<ul style="list-style-type: none"> <li>i. efficiently accommodates future growth and capacity for commercial, industrial, community and residential activities, primarily within the urban areas of the Timaru township, and the existing townships of Temuka, Geraldine, and Pleasant Point;</li> <li>ii. is integrated with the efficient use of infrastructure;</li> <li>iii. reduces adverse effects on the environment, including energy consumption, carbon emissions and water use;</li> <li>iv. protects drinking water supplies from the adverse effects of subdivision, use and development;</li> <li>v. is well-designed, of a good quality, recognises existing character and amenity, and is attractive and functional to residents, business and visitors;</li> <li>vi. avoids areas with important natural, cultural and character values;</li> <li>vii. minimises the loss of versatile soils;</li> <li>viii. enables papakāika, to occur on ancestral lands;</li> <li>ix. avoids locating new growth in areas where the impacts from natural hazards are unacceptable or which would require additional hazard mitigation; and</li> <li>x. controls the location of activities, primarily by zoning, to minimise conflicts between incompatible activities and avoid these where there may be significant adverse effects.</li> </ul>	<p>suitable development capacity and an area identified for future growth of Timaru.</p> <p>The Council has committed to funding a DAP for the area, which will provide greater insight into infrastructure needs and ensuring integration with existing infrastructure is achieved. Extending the FDA2 Overlay through the PTDP process will allow this area to be included in the DAP, helping to ensure infrastructure capacity is planned to support future development.</p> <p>The FDA2 overlay as proposed splits a large landholding where existing adjacent rural lifestyle blocks are established. The overlay as proposed creates a gap, potentially leaving a 26.6-hectare area of rural land surrounded with a mixture of new urban development and established rural lifestyle blocks. This has potential to lead to incompatible activities between rural and urban land uses as well as increasing the chance of incoherent and unplanned development occurring.</p> <p>Extending the FDA2 Overlay will help ensure a well-planned and well-designed outcome, supporting coherent residential development through a private plan change.</p>
<p><b>FDA-O2 Development within the Future Development Area</b></p> <p>Urban growth or rural lifestyle development does not occur within the Future Development Area Overlay until it is rezoned for the identified future land</p>	<p>The Request seeks to amend the FDA2 overlay to include a large land holding, adding development capacity to FDA2. By amending the FDA2 Overlay as part of the PTDP process, this will allow for the additional area to be included in preliminary studies which will further inform the DAP.</p>

PTDP Objective <sup>1</sup>	Assessment
<p>use and a comprehensive Development Area Plan is approved as part of that process.</p>	<p>The DAP is intended to provide a basis for a plan change application seeking the rezoning of the FDA2 land.</p>
<p><b>FDA-O3 Unanticipated and out of sequence development</b></p> <p>Unanticipated urban development outside of the Future Development Area Overlay or out of sequence development is only considered when significant development capacity is provided and it contributes to a well-functioning urban environment.</p>	<p>Extending the FDA2 Overlay promotes coordinated residential growth. This extension supports consistent residential development, if a private plan change to rezone the additional land is approved, mitigating the risk of unanticipated or out-of-sequence development.</p> <p>While inclusion within the FDA2 Overlay does not guarantee a plan change to be granted to enable residential development, it provides a framework for further investigation and plan change processes in areas the Council has identified as appropriate for residential growth, ensuring that infrastructure and services can be effectively planned and delivered, contributing to a well-functioning urban environment.</p>

50 On the basis of the above assessment, I conclude that the Request is consistent with the PTDP Objectives.

*Efficiency and Effectiveness*

51 In assessing the benefits and costs of the Request, the following options are considered:

- (a) Option 1: Retain the FDA2 Overlay as notified; or
- (b) Option 2: Extend the FDA2 Overlay in accordance with the Request.

52 The benefits and costs of each option are outlined in **Table 2** below.

**Table 2 Benefits and costs assessment**

Benefits	Costs
<p><b>Option 1 - Retain the FDA2 Overlay as notified</b></p>	
<ul style="list-style-type: none"> <li>The land outside the FDA2 overlay remains available for rural purposes.</li> </ul>	<ul style="list-style-type: none"> <li>Opportunity lost to rezone a large landholding to provide additional development capacity. If left as notified, a rural gap will be formed in the middle of proposed residential development and existing rural lifestyle properties and may lead to unintended constraints for future urban development opportunities.</li> <li>A rezoning request may be made through a Private Plan Change process, to change the underlying zoning from General Rural to General Residential. There would be an economic cost to the submitter as well as uncertainty on the outcome.</li> <li>Unanticipated development may not be accounted for during infrastructure upgrades, requiring additional upgrades, new infrastructure being required or delays in upgrades or new infrastructure being constructed.</li> <li>Does not contribute to the diversity of residential options or growth potential in the District.</li> <li>Potential for an undersupply of future growth areas, particularly where other FDAs are not progressed for rezoning. This could result in growth constraint occurring and challenge the Council's ability to give effect to the NPS-UD.</li> </ul>



Benefits	Costs
<b><i>Option 2 - Extend the FDA2 Overlay in accordance with the Request.</i></b>	
<ul style="list-style-type: none"> <li>• Enables additional development capacity adjacent to an area identified for growth and contributing to achieving coherent development outcomes.</li> <li>• Provides certainty to the Submitter to enable further investigations to occur to inform a future rezoning request.</li> <li>• Enables longer term planning and coordination of infrastructure requirements to service the area, by assessing this land earlier and in conjunction with the remaining FDA2 Overlay area. This also provides long term certainty for the Council when making decisions on future infrastructure decisions.</li> <li>• Identifies additional growth capacity, providing a buffer in the event other FDAs are not progressed.</li> <li>• Allows for environmental assessments to be conducted with a broader, more integrated perspective, evaluating the impacts of development within a wider context rather than through fragmented, piecemeal processes.</li> <li>• Planning a larger future development area enables more coordinated delivery of social infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduces land available for rural purposes.</li> </ul>

- 53 Option 2 is the preferred option as the benefits outweigh the costs. The costs outweigh the benefits in respect of Option 1.
- 54 The Request results in an increase to the land area included in the FDA2 overlay and likely potential development capacity within the FDA2 Overlay, supporting further investigations to clarify the development potential of the area, as well as the infrastructure and planning requirements necessary to inform a future plan change request.

#### *Risk of Acting or Not Acting*

- 55 The Request is limited to a mapping amendment to include additional land, allowing for further investigation into its development potential. This change does not alter the underlying zoning of the site and therefore does not permit residential development at this stage; rather, it enables assessment of the feasibility of potential future residential development.
- 56 The risk of inaction is that the full development capacity of the FDA2 Overlay, as currently mapped, may not be realised—potentially leading to a shortfall in capacity within the identified growth area, discontinuous development occurring and an opportunity for a comprehensive development to be lost. Including additional land in the mapping provides a buffer should some landowners within the existing FDA2 Overlay choose not to develop, helping to ensure the Council achieves the intended capacity in line with the NPS-UD and GMS 2022.
- 57 The risk of acting is that more development capacity than is needed is identified within FDA Overlays, however this risk is mitigated noting that an FDA Overlay does not rezone land and a private plan change process would be required to achieve a change in zoning and therefore there is a subsequent process whereby a specific rezoning request can be considered.

#### *Overall assessment*

- 58 In summary, I consider the Request is the most appropriate way, having had regard to matters of efficiency and effectiveness, to achieve the Objectives of the PTDP.

### **Statutory Framework**

#### *National Policy Statements*

- 59 The National Policy Statement for Urban Development is relevant to this Request.
- 60 As discussed in paragraphs [40-42], the NPS-HPL is not technically triggered as the FDA is not a rezoning request in the context of the NPS-HPL.

- 61 For completeness, I note that no other National Policy Statements have specific relevance to the Request.
- 62 An assessment of the Request against the specific objectives and policies of the NPS-UD is provided in **Table 3** below. The Site falls within the definition of an urban environment and Timaru is a Tier 3 District Council.

**Table 3 NPS-UD Objective and Policy Assessment**

Objective	Supporting Policies	Assessment
<p><b>Objective 1:</b> New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</p>	<p><b>Policy 1:</b> Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> <li>(a) have or enable a variety of homes that: <ul style="list-style-type: none"> <li>(i) meet the needs, in terms of type, price, and location of different households; and</li> <li>(ii) enable Māori to express their cultural traditions and norms; and</li> </ul> </li> <li>(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and</li> <li>(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</li> <li>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</li> </ul>	<p>The Request will contribute to a well-functioning urban environment, as assessed against the criteria in Policy 1.</p> <p>The proposed amendment will increase the development capacity within the FDA2 overlay, providing for a range of housing typologies and pricing range to be provided.</p> <p>The Site is located on the edge of the current urban boundary, which is well-connected to Timaru with good infrastructure connections, employment opportunities, community services and education. Provision of open and natural spaces can be provided within the Site, through recognising natural waterbodies within the Site.</p> <p>The FDA2 overlay is located in close proximity to Timaru, adjacent to the existing urban boundary – an area where future development is desirable. The FDA allows for a staged approach and release of development land as it is subject to a rezoning request being granted to release the land for development.</p>

Objective	Supporting Policies	Assessment
	<p>(e) support reductions in greenhouse gas emissions; and</p> <p>(f) are resilient to the likely current and future effects of climate change.</p>	<p>Schedule 15 sets out anticipated development timeframes.</p> <p>The Site includes the headwaters to Taitarakihi Creek. Modelling and further investigation will need to be completed to understand if these headwaters are likely to be impacted by climate change and the overall resilience of the Site. The inclusion of the Site in the FDA2 overlay will enable further investigations to be completed.</p> <p>Overall, the Request is generally consistent with Objective 1 and Policy 1 and will contribute to a well-functioning urban environment.</p>
	<p><b>Policy 2:</b> Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.</p>	<p>Timaru District Council has identified the number of dwellings required to meet the district's medium and high growth forecasts through to 2053.</p> <p>For both growth scenarios, the FDAs collectively provide enough land to meet demand, but only if all identified areas are successfully rezoned and developed. Including additional land within the FDA2 overlay adds flexibility and capacity, acknowledging that some areas may not be rezoned or may not come</p>

Objective	Supporting Policies	Assessment
		<p>forward for development. The Request offers an opportunity to deliver additional capacity adjacent to an existing FDA overlay, enabling cohesive and integrated development. It contributes to the overall housing supply, supporting the Council in meeting anticipated demand and meeting the requirements under the NPS-UD.</p>
<p><b>Objective 3:</b> Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</p> <p>(a) the area is in or near a centre zone or other area with many employment opportunities</p>	<p><b>Policy 5:</b> Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights or density of urban form commensurate with the greater of:</p> <p>(a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or</p> <p>(b) relative demand for housing and business use in that location.</p>	<p>The site is located on the edge of Timaru's urban boundary and benefits from access to established community services, including educational institutions. FDA2 has designated a significant area here for future development, acknowledging the recognised demand in this location. Funding the DAP will enable the collection of more detailed information to better understand future demand and the infrastructure required to support it.</p> <p>The Request is consistent with Objective 3 of the NPS-UD, to enable more people to live in areas where there is high demand for housing in relation of other areas within the urban environment.</p>

Objective	Supporting Policies	Assessment
<p>(b) the area is well-served by existing or planned public transport</p> <p>(c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.</p>		
<p><b>Objective 4:</b> New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</p>	<p><b>Policy 6:</b> When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <p>(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</p> <p>(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <p>(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing</p>	<p>Future development has been identified as being suitable for further investigation within the context of the Site. The amendment to the FDA2 overlay allows for further investigations to occur, to feed into future decisions on the rezoning.</p> <p>The Request presents an opportunity to include additional development capacity to further enable a cohesive residential development in an identified growth area.</p> <p>The Request provides additional capacity in a recognised growth area without leaving a gap between residential and rural lifestyle activities.</p>

Objective	Supporting Policies	Assessment
	<p>increased and varied housing densities and types; and</p> <p>(ii) are not, of themselves, an adverse effect</p> <p>(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</p> <p>(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</p> <p>(e) the likely current and future effects of climate change.</p>	<p>The Site includes headwaters of local waterways which will be modelled and assessed for climate change impacts to further understand if there are climate change related impacts.</p>
<p><b>Objective 6:</b> Local authority decisions on urban development that affect urban environments are:</p> <p>(a) integrated with infrastructure planning and funding decisions; and</p>	<p><b>Policy 8:</b> Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:</p> <p>(a) unanticipated by RMA planning documents; or</p>	<p>While the Request does not seek rezoning at this stage, Policy 8 is still relevant in relation to recognising additional development capacity. The inclusion of additional land within an FDA allows for further assessment of the Site and its potential contribution to the district's development capacity. Recognising this additional land within the FDA helps reduce the risk of unanticipated or out-of-sequence development by</p>



Objective	Supporting Policies	Assessment
<p>(b) strategic over the medium term and long term; and</p> <p>(c) responsive, particularly in relation to proposals that would supply significant development capacity.</p>	<p>(b) out-of-sequence with planned land release.</p>	<p>identifying sufficient capacity to accommodate projected medium and high growth residential demand.</p>

63 On the basis of the above assessment, I conclude that the Request is consistent with the NPS-UD Objectives and policies.

*Canterbury Regional Policy Statement*

64 Section 73(4) requires the PTDP to give effect to the Canterbury Regional Policy Statement (**CRPS**) and section 74(2) requires Council to have regard to the CRPS when preparing the PTDP. No changes to the PTDP Objectives are proposed and the Request has been assessed in **Table 1** above as remaining consistent with the PTDP Objectives.

65 Chapters 5 (Land Use and Infrastructure) of the CRPS are relevant to this Request.

66 Objective 5.2.1 and supporting policies addresses the design function and location of development.

67 The Site is located adjacent to the urban fringe of Timaru and directly adjoins the FDA2 overlay. As proposed, the FDA2 overlay disconnects the landholding. The Request to amend the FDA2 overlay to include the landholding would allow for additional development capacity leading to a more cohesive and coherent development in proximity to existing services and infrastructure. If the landholding is not included, there is potential for unanticipated effects to arise through fragmented development and land uses with the Site remaining as rural but being surrounded by residential and rural lifestyle activities.

68 Policy 5.3.1 addresses regional growth and meeting growth needs whilst ensuring sustainable development patterns. The Request provides potential for future development that is concentrated and well thought out in proximity to the existing urban area.

69 For the above reasons, the Request is considered to be consistent with the CRPS.

*Part 2 of the RMA*

70 Section 5 of the RMA outlines that the purpose of the RMA is to promote the sustainable management of natural and physical resources. The Request will enable the provision of people and communities' social, economic, and cultural wellbeing by providing an opportunity for residential development that contributes to a more diverse residential offering in Timaru.

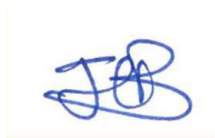
71 I consider that any adverse effects on the environment from the Request are able to be appropriately avoided, remedied or mitigated.

72 None of the matters identified in section 6 of the RMA are relevant to this Request.

- 73 In regard to section 7, the Request will enable further investigation to determine the efficient use and development of the subject land. The Request has the ability to respond to effects of climate change through site design and gaining a fuller understanding of climate change risks. The Site is located close to the urban fringe of Timaru, enabling a range of good connections to existing infrastructure, services and facilities.
- 74 With respect to section 8, the principles of the Treaty of Waitangi have been taken into account through the PTDP.

### **Conclusion**

- 75 For the reasons set out above, I consider that the proposed amendment to the FDA2 overlay is an appropriate outcome for the Site and is the most efficient and effective means of achieving the purpose of the RMA, the relevant objectives of the PTDP and other relevant statutory documents.



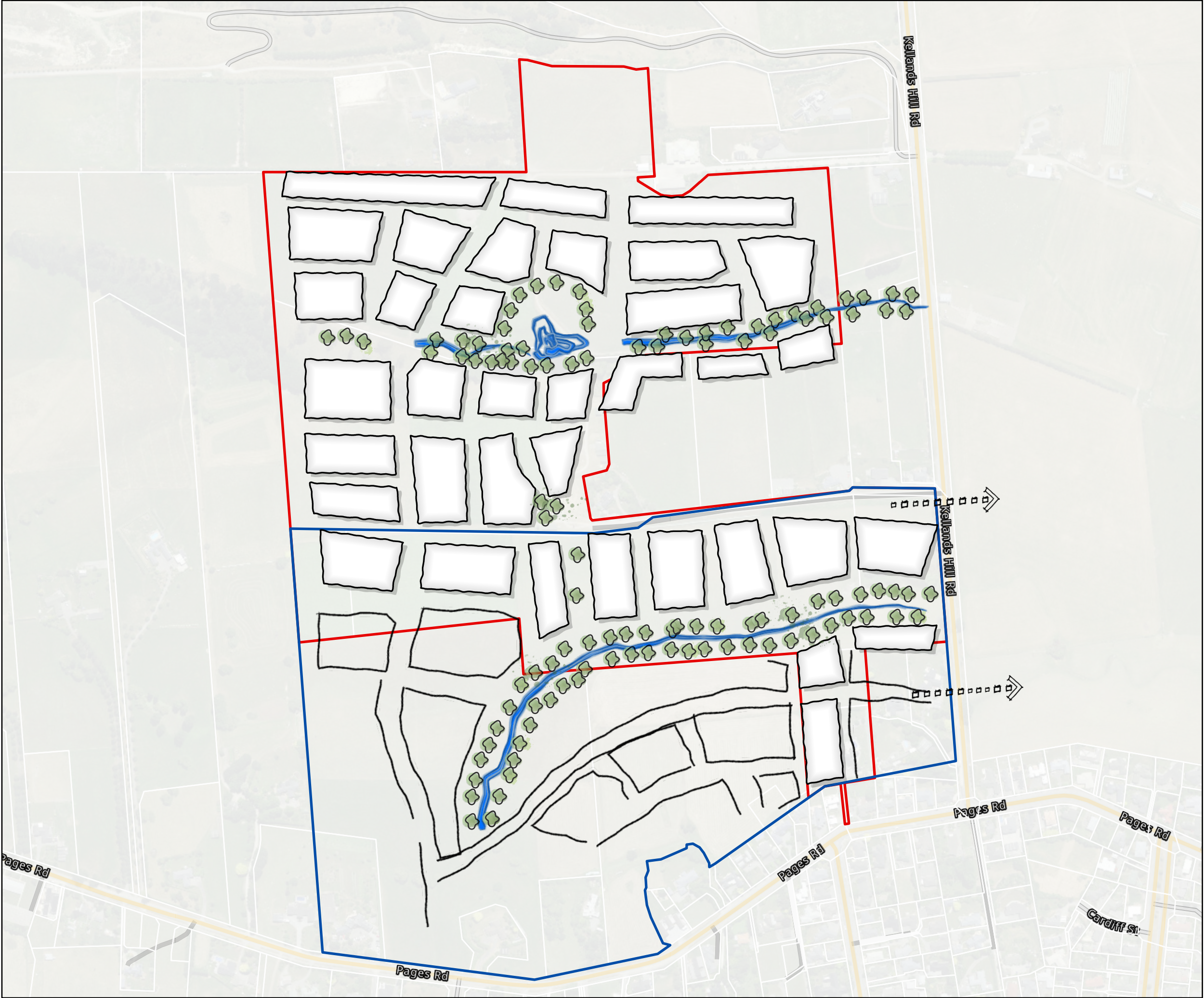
**Jessica Lucy Bould**

Dated this 27th day of June 2025

### **List of Attachments:**

Attachment [A]: Proposed Master Plan





- LEGEND**
- Travers Boundary
  - FDA Boundary

<b>REGULATORY</b>	
Site area	40.16 ha
<b>MASTER PLAN DETAIL</b>	
<b>Area in FDA</b>	<b>14 ha</b>
No. Blocks	10
Expected Yield total	8.5-12 dph 120-160
<b>Area not in FDA</b>	<b>26.16 ha</b>
No. Blocks	22
Expected Yield total	8.5-12 dph 187-264
<b>TOTAL</b>	<b>307-425</b>

MASTER PLAN

35 Kellands Hill

Travers Family

Source: LINZ

Date: 26/06/2025  
Scale: 1:4,500 @ A3  
Project: 3312-25



Revision:  
**2**

