



Monday 1 December 2025

Yedo Investments Limited
C/O Mark Geddes
77 Orbell Street
Timaru 7910

Email: mark@perspective.co.nz

Dear Mark,

**DECISION ON NOTIFICATION FOR COMBINED SUBDIVISION AND LAND USE CONSENT
RESOURCE CONSENT NOS. 101.2025.119.1 AND 102.2025.119.1
YEDO INVESTMENTS LIMITED
44 GRESHAM STREET, GERALDINE**

I advise that the notification decision for your resource consent application for Subdivision and Land Use Consents 101.2025.119.1 and 102.2025.119.1 respectively is to publicly notify the application pursuant to Section 95D of the Resource Management Act 1991 ('the Act'). This decision was made by an independent commissioner pursuant to an authority delegated by Timaru District Council, in accordance with section 34A of the Act.

Please find attached the Planning Officer's notification recommendation to this letter. The next step if you wish to proceed is to request a notification deposit which, after that is paid, we will endeavour to notify the application. We note that you have a standing deposit under a prior consent application for the same site. Please advise if you wish to have this transferred to this consent application. In accordance with Section 88H of the Act all time lapsed from the issue of this letter is excluded until the deposit is paid.

If you have any queries regarding your application, please contact me on the details below and quote the resource consent number.

Yours faithfully,

Patrick O'Toole
Intermediate Planner

Reference Numbers: 101.2025.0119.1 & 102.2025.119.1
Email: patrick.otoole@timdc.govt.nz
Phone: 03 684 0376

**REPORT ON AN APPLICATION FOR SUBDIVISION & LAND USE CONSENT
PURSUANT TO SECTIONS 95A & 95B OF THE RESOURCE MANAGEMENT ACT 1991**

Consent Number(s):	101.2025.119.1 & 102.2025.119.1
Applicant:	Yedo Investments Limited
Application Description:	<p>Subdivision consent to undertake a 25-lot rural-residential subdivision over two stages and establish a new road to vest and local purpose reserve for stormwater</p> <p>Land use consent to establish an undersized road, and to erect dwellings on proposed allotments, including setback and density non-compliances</p>
Activity Status:	DISCRETIONARY
Property Address:	44 Gresham Street, Geraldine
Legal Description:	Lot 2 DP 68947 & Lot 3 DP 68947
Operative District Plan Zone:	Rural 4A (Rural Lifestyle Sub Zone)
Proposed District Plan Zone:	Rural Lifestyle Zone
Author:	Patrick O'Toole Intermediate Planner
Date of Report:	27 November 2025

1. INTRODUCTION

This report has been prepared under section 42A of the Resource Management Act 1991 (the Act) to document the assessment of the subject application. This report also constitutes the reasons for the decision as required under section 113 of the Act.

2. PROPOSAL, SITE AND HISTORY DESCRIPTION

2.1 PROPOSAL DESCRIPTION

Subdivision

Yedo Investments Limited has applied for subdivision consent to subdivide the land legally described as Lots 2 & 3 DP 68947 at 44 Gresham Street, Geraldine into 25 rural-residential allotments over two stages. The subdivision will include the formation of a new looped road connecting Gresham Street and Huffey Street, along with associated infrastructure and landscaping works. Stage 1 will comprise 13 allotments: these being Lots 1-5, 20-25, 100 (a road), and the balance Lot 300. Stage 2 (being a further subdivision of Lot 300) will comprise 16 allotments: these being Lots 6-19, 101 (a road), and 200.

Figure 1 shows the development pattern for Stages 1 and 2 with the allotments pertaining to each stage.

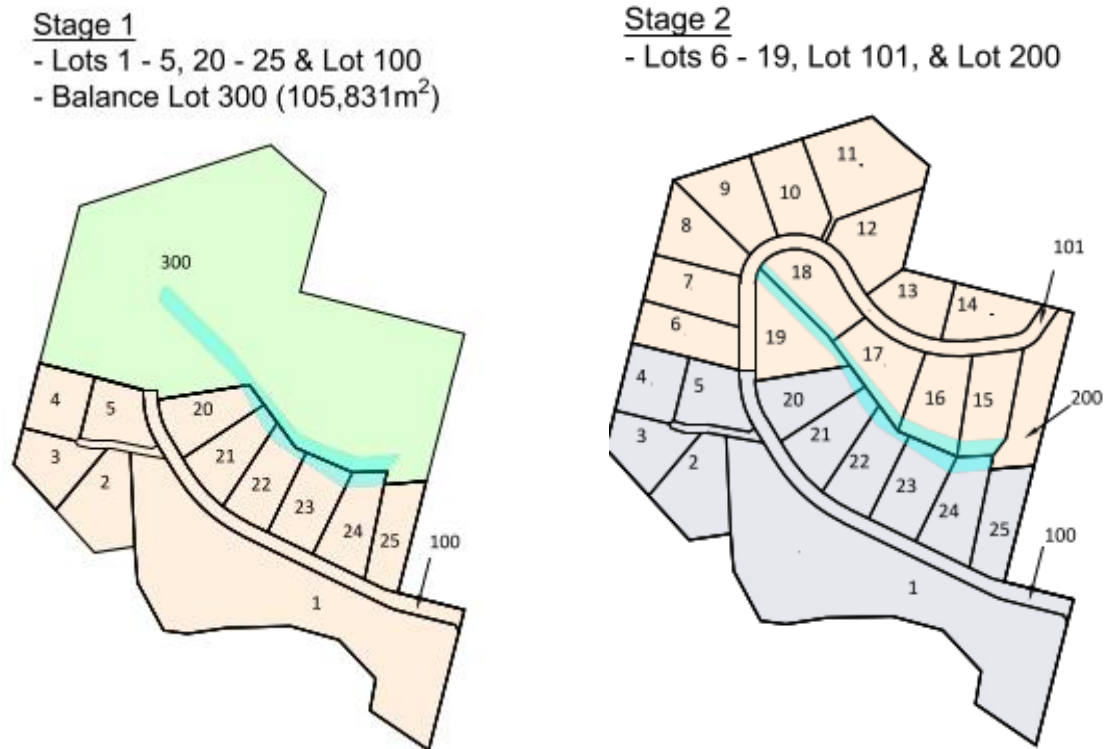


Figure 1: Allotment configuration for Stages 1 and 2. Source: Revised Scheme Plan¹.

Table 1 below shows the areas and proposed uses of each allotment for Stage 1.

Lot Number	Area (sqm) ²	Proposed Use	Lot Number	Area (sqm)	Proposed Use
1	44,083	Rural Residential	20	5,784	Rural Residential

¹ Received via email 21 November 2025. See CM9 Doc Ref 1808493.

² All areas are net unless where specified.

2	7,420	Rural Residential	21	5,758	Rural Residential
3	5,448	Rural Residential	22	5,822	Rural Residential
4	5,192	Rural Residential	23	6,179	Rural Residential
5	5,013	Rural Residential	24	6,107	Rural Residential
100	8,474	Road to Vest	25	5,552	Rural Residential
300	105,831	Balance Land			

Table 2 shows the areas and proposed uses of each allotment for Stage 2. Figure 2 shows the final development form after completion of Stage 2.

Lot Number	Area (sqm) ³	Proposed Use	Lot Number	Area (sqm)	Proposed Use
6	5,775	Rural Residential	14	5,014	Rural Residential
7	5,773	Rural Residential	15	6,153	Rural Residential
8	5,780	Rural Residential	16	6,326	Rural Residential
9	6,480	Rural Residential	17	6,203	Rural Residential
10	6,474	Rural Residential	18	6,021	Rural Residential
11	10,390	Rural Residential	19	7,382	Rural Residential
12	6,984	Rural Residential	101	9,062	Road to Vest
13	5,013	Rural Residential	200	7,000	Local Purpose Reserve (Stormwater)

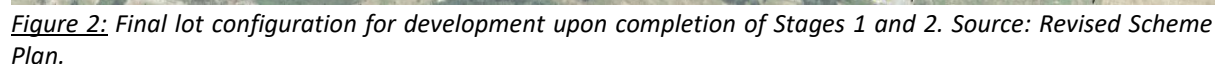
As shown in Tables 1 and 2, the proposed allotments will range between 5,000m² to 11,000m²: with Lot 1 being the only proposed allotment containing an existing dwelling and being notably larger at 44,083m² in size. New allotments for roads to be vested in Council (Lots 100 and 101) have been shown and cover the entirety of land to be vested as road for each corresponding stage. One local purpose reserve for stormwater purposes (Lot 200) will be created for Stage 2. An area within Lot 1 will also be subject to an easement in gross to drain stormwater, but this area will not be a defined land parcel in its own right.

Land Use Consent

The applicant has applied for land use consent to authorise future residential units within defined 32-metre x 32-metre building platforms on each of the new allotments, with those platforms on Lots 10 and 13-24 breaching the 15-metre site-boundary setback for the Rural 4A Zone when measured from the proposed new road, and Lots 8, 9, 14, and 25 when measured from neighbouring site boundaries within the application site.

³ All areas are net unless where specified.

Lastly land use consent is required for the proposed new legal road which will have a compliant 20-metre width for the first 100 metres from Gresham Street before reducing to a non-compliant 17-metre width for the balance of the road width. Infrastructure works will include a water supply extension of the existing watermain (or alternative options to be confirmed at engineering approval stage), and wastewater disposal through a combination of gravity and low-pressure systems connecting to Council's reticulated network. Stormwater will be managed through on-site attenuation tanks, swales, a central gully, and two detention ponds, discharging to Geraldine Downs Creek. I note that stormwater discharge consent (CRC260266) has been granted by Environment Canterbury.



Earthworks associated with the subdivision will not require a resource consent, per guidance under General Rule 6.0.1(2), and will include road formation, creation of building platforms, stormwater ponds, and reshaping of the central gully, with an estimated cut volume of 21,000–25,000 m³.

A comprehensive landscape plan has been provided with the application. The intention of the plan is to integrate the development into the Geraldine Downs environment. This includes street planting, landscaped bunds, and native species to enhance amenity and biodiversity values. Volunteered design controls are proposed to manage building height, materials, colours, and fencing, in order to maintain rural character. Consent notices are proposed to be used to secure these requirements.

The Applicant has also requested that the financial contribution of \$5,000 per lot (or \$120,000 total for 24 new allotments each capable of accommodating a new household unit) under Part D6.5, Rule 6.5.2.2(5)(a) be deferred until the time a Building Consent application is received for each new allotment. This financial contribution is required to support the development of walking and cycling tracks and habitat enhancement in the Geraldine Downs area.

2.2 SITE DESCRIPTION

The subject site is located at 44 Gresham Street, Geraldine and is zoned Rural 4A Rural Lifestyle Sub Zone in the Operative District Plan (ODP) and Rural Lifestyle Zone in the Proposed District Plan (PDP). The land has an area of approximately 21.77 hectares and is comprised of two land parcels legally described as Lot 2 DP 68947 and Lot 3 DP 68947 held in Records of Title CB45A/603 and CB40B/148 respectively.

The site has an irregular shape and undulating topography, with a shallow depression running east–west through its centre. The site is currently used for livestock grazing and contains an existing dwelling and ancillary farm buildings. Vegetation is predominantly pasture grass, with hedgerows and scattered specimen trees. The property has frontage to Gresham Street and an unformed section of Huffey Street, with the existing driveway servicing the single dwelling onsite (sited on proposed Lot 1) from Gresham Street. The site is not serviced by reticulated water supply or wastewater infrastructure. An aerial photograph of the application site is provided as Figure 3.

The surrounding environment is characterised by a mix of rural lifestyle and residential development typical of a site located on the town periphery. To the north, the site adjoins a rural lifestyle property accessed from Huffey Street and zoned Residential 5 under the ODP, proposed to be rezoned General Residential under the PDP. Further north are suburban residential properties along Darby Street, while Downs Road accommodates rural residential lots. To the west, the land comprises larger rural holdings of approximately 8 to 10 hectares. The southern boundary adjoins the Grande Vue Golf Course, zoned Sport and Active Recreation Zone under the PDP and the same zoning as the application site under the ODP. To the east, the site borders suburban residential properties within the Residential 1 Zone (General Residential under the PDP).

The site is contiguous with the Geraldine urban boundary and lies within an area identified in the Geraldine Downs Landscape Study as having high visual amenity values. The PDP identifies overlays including a flood assessment area within the central gully, a light-sensitive area, and a visual amenity landscape classification. The site is not identified as a Significant Natural Area and does not contain any water bodies requiring esplanade reserves under the ODP. The Listed Land Use Register confirms that no Hazardous Activities and Industries List (HAIL) activities have occurred on the site, and the National Environmental Standard for Assessing and Managing Contaminants in Soil does not apply.

The location of the site relative to both the Geraldine Downs and the Geraldine township is illustrated in Figure 4.



Figure 3: Aerial photograph of application site. The subject land is highlighted in blue (Source: Council GIS).



Figure 4: Location of application site relative to the open character of the Geraldine Downs left of image and urban character of the Geraldine township to the right. Subject land highlighted in blue (Source: Council GIS).

A site visit was undertaken 26 November 2025. The applicant was not present during the site visit. Photographs taken during the site visit are held in the resource consent file⁴.

2.3 SITE HISTORY

The following is a summary of the relevant site history:

Resource Consents:

Approvals

- Land Use Consent No. 102.2003.26550.1 was granted in May 2003 to add a veranda to the existing dwelling and a roof over the deer yards.
- Subdivision Consent No. 101.2022.71.1 was granted in January 2025 to carry out a boundary adjustment encompassing Lot 1 of this subdivision and the balance area of the two existing allotments. Certification under s223 and s224 has not been granted. I note that as part of a s92(1) request for further information, the Agent confirmed that the Applicant has no intention to implement 101.2022.71.1 following this resource consent's application and ongoing processing.

Processing

- Applications for Subdivision Consent No. 101.2023.94.1 and Land Use Consent 102.2023.94.1 were received July 2023 for a 21-lot fee simple subdivision with similar configuration to this development proposal that has been on a volunteered s91D hold under the Act following a notification decision to publicly notify that proposal. This followed a previously returned consent application (101.2023.86.1) for the same development as incomplete.

Building Consents:

There is no Building Consent history relevant to the application.

3. TIMARU DISTRICT PLAN

3.1 ZONING AND COMPLIANCE ASSESSMENT

The subject site is zoned Rural 4A, Rural Lifestyle Sub Zone in the Operative Timaru District Plan (ODP) and Rural Lifestyle Zone in the Proposed Timaru District Plan (PDP). The activity status of the proposal is commented on below:

Operative Timaru District Plan

Subdivision

Rule	Assessment
Rule 6.3.5 – Discretionary Activities in All Zones	APPLIES Performance standards breached by the proposal are set out in the following Table.

⁴ See CM9 Doc Ref 1809382.

(i) Any subdivision which does not comply with one or more of the Performance Standards for subdivision, except as prescribed in Section 6.3.5A.	
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Performance Standard	Assessment
<p>6.3.7 - Performance Standards for Subdivision in All Zones</p> <p>(1) All relevant performance standards applicable within the zone shall be complied with or consent to a discretionary or non-complying activity shall be obtained.</p> <p>(2) Sites shall be of a regular shape so as to facilitate the efficient use of the land except where an alternative would better satisfy the objectives or policies of the Plan and where recognition is given to natural features on the site.</p> <p>(3) For allotments for access, utilities, telecommunication facilities and radiocommunication facilities, reserves and roads there shall be no minimum allotment size, diameter, or frontage in any zone.</p>	<p>COMPLIES</p> <p>The site already has an irregular shape, but the proposed allotments are as regular a shape as can be attempted for the site. The zone non-compliances are outlined below. Lots 100, 101 and 200 are to be vested as reserves in Council and have not been assessed for minimum allotment size, diameter, or frontage.</p>
<p>6.3.11 - Performance Standards for Subdivision in All Rural Zones</p> <p>(1) All allotments created by subdivision in Rural Zones shall have a minimum legal road frontage of 8 metres or shall be provided with access by way of an 8-metre-wide private access.</p> <p>(2) Where a corner allotment is included in any subdivision the corner shall be cut off to a distance, along the road frontages, of not less than 15 metres from the intersection and vested as road.</p> <p>(3) Properties within a rural water supply scheme will require evidence of access to the scheme for stock water, or an alternative water supply, and be subject to a consent notice registered against the title.</p> <p>(4) New allotment boundaries shall be set back 30 metres from any wetland except for esplanade reserves.</p>	<p>DOES NOT COMPLY</p> <p>1- Lots 2 and 3, while they do not have 8 metres of legal road frontage, are accessed via an 8-metre-wide private right of way easement burdened by Lot 4. Lots 1 and 5-25 all comply with the minimum 8-metre frontage requirement.</p> <p>2 - Visibility splays have been provided for in the road design, but the splay at the Gresham Street intersection with the new road does not comply with a 15-metre setback as measured from the same intersection.</p> <p>Performance standards 3 and 4 are not relevant to the proposal.</p>

Rule	Assessment
<p>6.3.15A - Rules for Subdivision in Rural 4A Zone (Geraldine Downs)</p> <p>(2) Discretionary</p> <p>Any subdivision in the Rural 4A (Geraldine Downs Zone) which does not comply with any Performance</p>	<p>APPLIES</p> <p>Performance standards breached by the proposal are set out in the following Table.</p>

Standards under Section 6.3.15A(3) of the District Plan shall be a Discretionary Activity.	
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Performance Standard	Assessment
<p>6.3.15A.3 - Performance Standards for subdivision in the Rural 4A (Geraldine Downs) Zone</p> <p>(i) Minimum Allotment Size</p> <ul style="list-style-type: none"> Rural Residential Subzone - 2 ha with the exception of Lots 1 and 2 DP 444786 which shall have minimum site area of 5000m². Rural Lifestyle Subzone - 10 ha Rural Production Subzone - 40 ha <p>(ii) Walkways and Cycleways</p> <p>All subdivisions shall vest land to Timaru District Council for the walkways and cycleways as indicated in Appendix 1 of the Rural 4A Zone. The walking and cycling tracks shall have a minimum legal width of 2.5 metres.</p>	<p>DOES NOT COMPLY</p> <p>1 - The proposed subdivision creates allotments (Lots 2-25) well below the 10-hectare minimum allotment size ranging from 5,013m² to 10,390m² in area.</p> <p>2 – The site contains a part of the Walking and Cycling Network shown in Appendix 1 of Part D1, Rule 1.11.4A of the Plan. This land has not been offered to be vested in Council.</p>

Operative Timaru District Plan

Land Use – Rural 4A Zone

Rule	Assessment
<p>Rule 1.11.4A.3 – Restricted Discretionary Activities</p> <p>3.1(a) New buildings, including farm buildings (except that provided as a permitted or controlled activity), household units, accessory buildings and works (including accessways) to household units, fences and walls not provided as a permitted activity and telecommunication/radio communication facilities not permitted by the NES (Telecommunication Facilities12);</p>	<p>APPLIES</p> <p>Consent is sought to establish future building platforms that will authorise all new residential built form and ancillary buildings within each defined area.</p>
<p>Rule 1.11.4A.3 – Restricted Discretionary Activities</p> <p>Rule 3.4 - Any activity that does not comply with the Performance Standards for the zone or general rules. Discretion is limited to the matter not complied with.</p>	<p>APPLIES</p> <p>Performance standards breached by the proposal are set out in the following Table.</p>

Performance Standard	Assessment
<p>1.11.4A.6 - Performance Standards for All Activities in This Zone</p> <p>Sunlight and Outlook</p> <p>6.1(a) All buildings in the Geraldine Downs Rural Production Sub Zone and Rural Lifestyle Sub Zone shall be set back a minimum of 15 metres from site boundaries.</p>	<p>DOES NOT COMPLY</p> <p>The building platforms for Lots 10, and 13-24 are within 15 metres of the boundary with a neighbouring allotment created under this subdivision proposal.</p> <p>Lots 8 (162 Greenvale Road), 9 (31 Downs Road), 14 (1 Huffey Street) and 25 (32 & 34 Gresham</p>

<p>6.1(b) N/A</p> <p>6.2 All buildings shall be contained within a building envelope constructed by recession planes as set out in Appendix 2 of the District Plan.</p> <p>6.3 The maximum height of buildings shall be 8 metres.</p> <p><i>Visual Amenity</i></p> <p>6.4(1) Reflective metal finishes shall not be allowed.</p> <p>6.4(2) A landscape plan shall be submitted with each resource consent application for a household unit, accessory building or commercial development (except farm buildings). The landscape plan should be prepared by a suitably qualified person, with qualifications formally accredited by the New Zealand Institute of Landscape Architects, or a full member of that institute. However if applicants do not use an appropriately qualified person to prepare the landscape plan, then Council may, if considered necessary, have such a plan peer reviewed by a qualified landscape architect which will be at the cost of the applicant.</p> <p><i>Noise</i></p> <p>6.5-6.7 N/A</p> <p><i>Servicing</i></p> <p>6.8 For household units, Council will require evidence of access to potable (drinkable) water from either a community water supply scheme, a private bore, or be able to provide storage of potable (drinkable) water from another source subject to a consent notice registered against the title.</p> <p><i>Artificial Lighting</i></p> <p>6.9(1) Except street lighting, no lighting exceeding 5 lux measured in the horizontal or vertical plane shall fall on adjoining properties.</p> <p>6.9(2) All outdoor lighting (including street lighting) shall be shielded from above in such a manner that the edge of the shield shall be below the whole of the light source.</p> <p>6.9(3) All fixed exterior lighting shall be directed away from adjacent roads and properties.</p> <p><i>Minimum Site Area Requirements for a Household Unit in the Rural 4A Zone (Geraldine Downs)</i></p> <p>6.10(2) Rural Lifestyle Sub Zone - 10 ha</p> <p><i>Stormwater Management</i></p> <p>6.11(1) All buildings shall be setback a minimum of 10 metres from the centre line of a stream or river.</p> <p>6.11(2) Any impermeable areas of new development shall be provided with on-site storage and</p>	<p>Street) are also within 15 metres of existing boundary with neighbouring properties (the affected property being identified in brackets).</p> <p>6.3 - The proposed buildings will all have conditions restricting their height to below 8 metres.</p> <p>6.4 - Volunteered conditions of consent also prohibit reflective colours and the site as whole has been submitted with a comprehensive landscape plan and planting specimen list.</p> <p>6.8 - The Applicant has provided a Development Capacity Assessment (DCA) from WSP and an Engineering Servicing Memorandum (ESM) from Davis Ogilvie that together outline the capacity of the existing reticulated water supply network and solutions to provide servicing for the proposal. Infrastructure upgrades and extensions of the existing mains will be required for the site, and this will be confirmed at the time of engineering approval. For the purpose of this rule assessment this arrangement is considered compliant.</p> <p>6.9 –All lighting proposed for future built form will need to comply with this requirement, but since no built form is proposed as part of this development this standard is considered complied with.</p> <p>6.10 – Per the subdivision breach this standard is also not complied with.</p> <p>6.11 - All proposed building platforms are well setback from any streams or rivers and attenuation provisions are compliant with this standard.</p> <p>6.12 – All proposed earthworks are in conjunction with a subdivision consent and so for the purpose of this assessment are deemed as permitted.</p> <p>6.13 – The proposed water supply solution for the subdivision involves an extension of the reticulated water supply main such that all future dwellings on each of the rural-residential allotments will not be connected to a Council water supply scheme. As a result, this performance standard does not apply.</p>
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<p>attenuation of stormwater to cater for a 1 in 5 year storm event.</p> <p><i>Earthworks</i> 6.12(1-5) Provided that Rule 6.12 does not apply to the following earthworks:</p> <ul style="list-style-type: none"> • Earthworks in conjunction with the construction of a building and access to that building; • Earthworks involved in subdivision, provided that detailed engineering plans for these earthworks have been expressly approved by the Council as part of the subdivision consent process; • Cultivation; • Tree planting; • Earthworks as part of the construction of a walkway or cycleway indicated in Appendix 1 of the Rural 4A Zone (Geraldine Downs). <p><i>Rainwater Harvesting</i> 6.13 All new household units and commercial buildings (excluding accessory buildings less than 35m² in area) that are connected to a Timaru District Council operated water supply scheme shall be fitted with a storage tank to harvest rainwater. The storage tank shall have a minimum capacity of 10,000 litres. Rainwater storage tanks shall provide backflow prevention that shall comply with the Water Supply Protection Regulations 1961 where connections to a potable water supply exist.</p>	
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Land Use – Financial Contributions

Rule	Assessment
<p><i>Rule 6.5.2.2(3) Discretionary Activity</i> Any application to have General Rule 6.5.2.2.1 or 6.5.2.2.2 varied or waived is a discretionary activity.</p>	<p>APPLIES Rules breached by the proposal are set out below.</p>
<p><i>Rule 6.5.2.2(5) Rural 4A Zone (Geraldine Downs)</i> (a) At the time of resource consent, or building consent for a new dwelling that does not need resource consent, all new development in the Rural 4A (Geraldine Downs) Zone shall pay a financial contribution to Timaru District Council. The financial contribution shall be in the form of money or land or a combination thereof. The value of the financial contribution shall be determined in accordance with the following table:</p>	<p>DOES NOT COMPLY (a) – The Applicant wishes to defer this financial contribution so that it is paid at the time of Building Consent. Since all new dwellings in the Rural 4A Zone require resource consent (as what is being applied for herein with the defined building platforms for future dwellings) the time for this payment to be made is with this application. The deferment is considered a non-compliance with this Rule.</p>

<p>New Household Unit or new allotment that will accommodate a new household unit:</p> <ul style="list-style-type: none"> • \$3,000 Tracks • \$2,000 Natural Habitat <p>(b) Where the land to be subdivided or developed contains part of the off-road walking and cycling tracks identified in Appendix 1 of the Rural 4A Zone being the tracks and esplanade strip numbered 1, 2 and 3, the financial contribution shall be in the form of land (or an interest in that land) up to the level determined by the table above. In circumstances where further land is required to complete the track alignment within the property to be developed that is in excess of the financial contribution, such land shall only be acquired by negotiation and agreement between the parties, with appropriate compensation paid.</p>	<p>(b) – Applies. The land to be subdivided contains parts of the walking and cycling tracks defined in Appendix 1 of the Rural 4A Zone. The Applicant has not volunteered a financial contribution in the form of that land up to the defined value for the Rule. This is also considered a non-compliance with this Rule.</p>
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Land Use – Roading

Rule	Assessment
<p><i>Rule 6.6.3 Discretionary Activities</i></p> <p>(3) Any proposal which does not comply with any Rule regarding road widths of private accesses or roads.</p>	<p>APPLIES</p> <p>The proposed road will narrow to 17 metres which is less than the minimum access requirement for local roads serving more than 7 household units in Rural zones (20 metres).</p>

Land Use – Signs

Rule	Assessment
<p><i>Rule 6.15.2.7 Discretionary Activities in Recreation, Residential, and Rural Zones</i></p> <p>The following are discretionary activities subject to complying with the General Rules:</p> <p>Any sign listed as a permitted activity which does not meet with any of the Performance Standards is a discretionary activity.</p>	<p>APPLIES</p> <p>Performance standards breached by the proposal are set out in the following Table.</p>

Performance Standard	Assessment
<p><i>6.15.2.8 - Performance Standards for Signs in Recreation, Residential and Rural Zones</i></p> <p>(1) All signs shall comply with the height and recession plane requirements for the zone in which they are located.</p>	<p>DOES NOT COMPLY</p> <p>1 – The signs comply with the height and recession plane requirements for the Rural 4A Zone.</p>

<p>(2) The maximum total area of signs on any site shall not exceed the following:</p> <ul style="list-style-type: none"> • 0.5m² in Residential Zones • 3m² in Recreation and Rural Zones <p>(3) No sign shall be erected on or adjacent to a road which will:</p> <p>(a) Obstruct the line of sight of any corner, bend, intersection or vehicle crossing;</p> <p>(b) Obstruct, obscure or impair the view of any traffic sign or signal;</p> <p>(c) Resemble or be likely to be confused with any traffic sign or signal;</p> <p>(d) Use reflective materials that may interfere with a road users vision;</p> <p>(e) Use intermittent or revolving lights.</p> <p>(f) Internally and externally signs shall not exceed the maximum luminance as set out in the following table:</p>	<p>2 – The signs will be 2.1m high x 1.7m wide resulting in a total area of 3.57m² and is therefore non-compliant.</p> <p>3 – The signs will not obstruct corner visibility, impair views from traffic signals, and have been sufficiently setback from new intersections. Reflective materials will not be used in the signs' construction and will not incorporate intermittent or revolving lights. For this assessment it is assumed the signs do not breach the luminance standard (600 candelas/m²).</p>
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Proposed Timaru District Plan

The PDP was publicly notified on 22 September 2022. The following rules in the PDP have immediate legal effect:

Chapter	Rule(s)
Activities on the Surface of Water Chapter	All rules
Historical Heritage Chapter	All rules
Ecosystems and Indigenous Biodiversity Chapter	All rules
Versatile Soils Chapter	All rules
Sites and Areas of Significance to Māori Chapter	All rules
Drinking Water Protection Chapter	All rules
Natural Character Chapter	NATC-R1 and NATC-R3
Subdivision Chapter	Subdivision within the General Rural Zone: <ul style="list-style-type: none"> • SUB-R3, SUBS1.3.1 and associated General Rural Zone map
Transport Chapter	Accessible parking and loading spaces: <ul style="list-style-type: none"> • TRAN-R5 as it relates to TRAN-S7 • TRAN-R6 as it relates to TRAN-S4

None of the above rules with legal effect are relevant to the application.

3.2 ACTIVITY STATUS

Overall, the application is assessed as a **Discretionary Activity**.

4. NATIONAL ENVIRONMENTAL STANDARDS

National Environmental Standards are regulations made under the Resource Management Act 1991 that set nationally consistent technical standards, methods, or requirements for various activities that effect the environment. A total of 10 National Environmental Standards are currently in effect, as follows:

- The National Environmental Standards for Air Quality 2004.
- The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011;
- The National Environmental Standards for Commercial Forestry 2023; and
- The National Environmental Standards for Electricity Transmission Activities 2009;
- The National Environmental Standards for Freshwater 2020;
- The National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat 2023;
- The National Environmental Standards for Marine Aquaculture 2020;
- The National Environmental Standards for Sources of Drinking Water 2007;
- The National Environmental Standards for Storing Tyres Outdoors 2021; and
- The National Environmental Standards for Telecommunication Facilities 2016.

The National Environmental Standards relevant to this application are assessed below:

4.1 The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS)

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS) came into force on 10 October 2011. Clause 5 of the NES-CS sets out that these regulations:

- apply when a person wants to do an activity described in any of subclauses (2) to (6) on a piece of land described in sub-clause (7) or (8):*
- do not apply when a person wants to do an activity described in any of subclauses (2) to (6) on a piece of land described in sub-clause (9).*

On that basis whether or not the regulations apply depends on whether the application site is described as a 'piece of land' under sub-clause (7), being:

- an activity or industry described in the HAIL is being undertaken on it:*
- an activity or industry described in the HAIL has been undertaken on it:*
- it is more likely than not that an activity or industry described in the HAIL is being or has been undertaken on it.*

Irrespective of whether or not a 'HAIL' activity has been undertaken on the land on which the network is proposed to cross, sub-clause (8) sets out that these regulations only apply to production land, if a person wants to:

- b) *sample or disturb-*
 - (i) *soil under existing residential buildings on the piece of land:*
 - (ii) *soil used for the farmhouse garden or other residential purposes in the immediate vicinity of existing residential buildings:*
 - (iii) *soil that would be under proposed residential buildings on the piece of land:*
 - (iv) *soil that would be used for the farmhouse garden or other residential purposes in the immediate vicinity of proposed residential buildings.*
- c) *subdivide land in a way that causes the piece of land to stop being production land*
- d) *change the use of the piece of land in a way that causes the piece of land to stop being production land.*

The applicant has provided a Listed Land Use Register (LLUR) report from Environment Canterbury (Appendix 7 of the AEE). The LLUR report confirms:

- That no HAIL activities have been identified on the site.
- That no HAIL activities are currently or have historically been undertaken on the site.

The site is currently used for pastoral farming and contains a dwelling and ancillary farm buildings. There is no evidence of activities such as sheep dips, fuel storage, or other HAIL-related uses. The proposal involves the subdivision of the two contiguous land parcels into 25 rural residential allotments and a change in land use to enable residential development. While these activities would normally fall within the scope of NES-CS if HAIL activities were present, the absence of any identified HAIL activities means the NES-CS does not apply.

5. SECTION 95/NOTIFICATION ASSESSMENT

5.1 Public Notification (Section 95A)

Section 95A of the RMA requires consent authorities to follow the below steps in order to determine whether to public notify an application for resource consent:

Step 1 - Mandatory public notification in certain circumstances s95A(3)

In this case, public notification is not required under Step 1 as:

- the applicant has not requested public notification of the application (section 95A(3)(a)); and
- public notification is not required under section 95C due to the refusal/failure to provide further information or to agree to the commissioning of a report (section 95A(3)(b)); and
- a joint application was not lodged to exchange reserve land under the Reserves Act 1977 (section 95A(3)(c)).

Step 2 - If not required by Step 1, public notification precluded in certain circumstances s95A(5)

In this case, public notification is not precluded under Step 2 as:

- the application is not subject to a rule or national environmental standard that precludes public notification (section 95A(5)(a)); and

- the application is not for one of the following:
 - a controlled activity; or
 - a restricted discretionary, discretionary, or non-complying activity, but only if the activity is a boundary activity as defined by section 87AAB of the Act.

Step 3 - If not Precluded by Step 2, Public Notification is Required in Certain Circumstances s95A(8)

An assessment of the adverse effects of the activity on the environment is provided below:

Mandatory exclusions from assessment (s95D)

A consent authority when deciding whether an activity will have or is likely to have adverse effects on the environment that are more than minor:

- must disregard any effects on persons who own or occupy land in, on or over which the activity will occur or any land adjacent to that land (s95D(a));*

Effects on persons who own or occupy land in, on, or over which the activity will occur have been disregarded for this s95D assessment.

- may disregard an adverse effect of the activity if a rule or national environmental standard permits an activity with that effect (s95D(b) (i.e., the permitted baseline test);*

The permitted baseline has not been considered as the activity is not listed as a permitted activity in the ODP or a National Environmental Standard.

- must disregard an adverse effect that does not relate to a matter of discretion, if the activity is a Restricted Discretionary Activity (s95D(c));*

The application is for a discretionary activity. Councils' discretion is therefore unrestricted.

- must disregard trade competition and the effects of trade competition (s95D(d)); and*

The effects of trade competition are not relevant to the subject application.

- must disregard the effects on persons who have given written approval to the application (s95D(e)).*

The application includes written approvals from the following persons⁵:

Name	Address
Gyles Roger Patrick (Owner-Occupier)	8 Gresham Street, Geraldine
Bronwyn Jane Evelyn Patrick (Owner-Occupier)	

⁵ Affected party approvals received for 2, 34, and 36 Gresham Street do not include the approvals of all listed landowners. For all affected party approvals, the form has been completed but have not been accompanied by the signed and dated plans. Approvals received 17 October 2025. CM9 Doc Ref 1801186.

Satendra Singh (Owner-Occupier)	2 Gresham Street, Geraldine
Yvonne Denise Weaver (Owner-Occupier)	34 Gresham Street, Geraldine
	36 Gresham Street, Geraldine

Assessment of Effects

Landscape and Visual Amenity Effects

The site is located within the Rural 4A, Rural Lifestyle Sub Zone under the ODP, and the Geraldine Downs Visual Amenity Landscape in the PDP (although without legal effect) which anticipates low-density development to maintain openness and rural character. The proposal represents a significant increase in density from the permitted baseline of one dwelling per 10 hectares to 25 lots ranging from approximately 5,000 m² to 10,000 m², in addition to setback non-compliances generated from future building platforms both with notional boundaries brought about by the proposed subdivision as well as with existing neighbouring properties.

I have structured this part of the assessment into four sections. The first three sections assess the density non-compliances brought about by the proposal and in sequence cover the conclusions made by the Applicant's landscape architect in the attached Landscape Visual Assessment (LVA) (attached as Appendix A), second where those conclusions are agreed/disagreed with by an independent peer review of the LVA, and third my personal assessment that looks to integrate the two positions and provide my determination of this effect for notification. The fourth section assesses the effects of the boundary setback infringements generated from the building platforms for Lots 8-10, and 13-25.

Applicant's Position

The Applicant supplied with the application document a comprehensive Landscape and Visual Assessment by Glasson Huxtable that recognises the site's location within the Geraldine Downs Visual Amenity Landscape and the Rural Lifestyle Sub Zone under the ODP. The assessment acknowledges that the proposal would introduce a noticeable change in land use, transitioning the site from pastoral farmland to a large-lot residential subdivision. It identifies potential issues such as the increase in density from two lots to twenty-five lots, the introduction of a new road and associated infrastructure, and the addition of fencing and lighting and potential adverse effects and mitigatory recommendations for each.

In spite of the numerous changes and the introduction of new built form to the landscape, the landscape architect concludes that the overall landscape effects will be low, (or less than minor), provided that mitigation measures are implemented. These measures include the allocation of building platforms to avoid ridgelines, a maximum building height of six metres (below the eight metres permitted in the zone), and design controls for colour, materiality, and fencing to maintain rural character. Extensive planting is proposed along boundaries, within lots, and around stormwater basins to soften built form and integrate the development into its surroundings. I include below the change and effects comparison table as set out in the Te Tangi a te Manu Aotearoa New Zealand Landscape Guidelines (p.151) for ease of comparison between landscape assessment and RMA terminologies.

			SIGNIFICANT			
LESS THAN MINOR	MINOR		MORE THAN MINOR			
VERY LOW	LOW	LOW-MOD	MODERATE	MOD-HIGH	HIGH	VERY HIGH

In terms of visual effects, the assessment by Glasson Huxtable finds that views from public vantage points such as Huffey Street, Gresham Street, and Darby Street will experience only low adverse effects, while effects on adjoining properties will range from very low to low-moderate adverse effects. The undulating landform and proposed planting are considered to provide sufficient capacity to absorb change as confirmed at [7.4] of the LVA. The assessment describes the subdivision as forming a transitional area between rural and residential zones, noting that the proposed lot sizes are larger than those in the adjacent residential areas and therefore not out of context with neighbouring development. Positive effects are also identified, including enhanced amenity and ecological planting, creation of a local purpose reserve, and improved stormwater management. Overall, the landscape architect concludes that the site can accommodate the subdivision without altering the prominent rural character of the wider Geraldine Downs area and that landscape and visual effects will be low, or less than minor.

Peer Review

An independent peer review was prepared by Ms Hannah Wilson from Boffa Miskell in November 2025 engaged under powers authorised in s42A of the Act (and attached as Appendix B). The peer review agrees with the landscape architect's assessment on methodology, identification of landscape values and potential issues emerging from the development. It also acknowledges the importance of mitigation measures such as planting and building platforms, however, reaches a different conclusion on the magnitude of effects experienced by the receiving environment.

The peer review finds that the proposal will result in moderate, or more than minor, adverse effects on landscape character. This conclusion is based on the loss of rural openness, the increased sense of domestication, and the extension of the urban edge into the Geraldine Downs that has not been anticipated by the zoning under the ODP, or the revised zoning classification of the PDP despite its surrounding land parcels being rezoned under the District Plan Review process (e.g., 1 Huffey Street rezoned from Residential 5 (Future Residential, Geraldine) to General Residential). The review considers that these changes will be perceived as urban sprawl and will undermine the legibility of the settlement boundary. While mitigation measures such as planting will assist in integrating the development over time, the timeframe for planting to establish is likely to exceed five years, meaning that short- to medium-term effects will remain significant and cannot be considered low.

In relation to visual effects, the peer review broadly agrees with the landscape architect's assessment of public viewpoints, which are considered to experience low adverse effects. However, it identifies omissions in the applicant's assessment, particularly mid-range views from properties accessed off Cox Street. These properties are likely to experience low to moderate adverse effects due to open views of the site and its change in character. The peer review recommends that these properties be included in limited notification if public notification does not occur. Overall, the peer review concludes that the proposal will have moderate adverse effects on landscape character.

Integrated Assessment & Determination

Having considered both assessments, I find that the landscape architect's (and by extension the Agent's AEE) rely heavily on mitigation and long-term planting to justify the identified 'low' adverse effects. While these measures are important, they will take years to mature, and the immediate change in character is substantial. The peer review in my opinion correctly highlights that the proposal

exceeds the anticipated density for the Rural Lifestyle Sub Zone and introduces a clear urban element shifting the perceived urban edge of the township westward into a visually sensitive landscape. This outcome is inconsistent with the anticipated environment set out in the objectives and policies of the ODP, which seek to retain openness and rural character and avoid intensive development in rural zones.

Regarding the urban 'edge', both the landscape architect and the Applicant's AEE refer to the "transition" between residential and rural-residential/rural-lifestyle zoned property and the appropriateness of the density sought for the site. For ease of reference, I include an excerpt from p.23 of the Applicant's AEE:

I agree with the landscape report that the site provides a suitable transition area between an existing zoned residential and rural residential area, being the:

- houses on the western side of Gresham Street located in the Residential 1 Zone¹
- land on the northern side of Huffey Street located in the PDP's General Residential Zone²
- Rural Residential Subzone of the ODP that exists on the site's north-western boundary³
- Sport and Active Recreation Zone adjoining the site to the south.

The site's context in relation to these two areas is illustrated in **Figure 6**.

There are 17 properties along the western side of Gresham Street that have lot sizes ranging from 700m² to 0.55 ha with an average lot size of 1,370m². The General Residential Zone of the PDP will allow these properties to be subdivided further to 450m² minimum lot sizes. It will also allow the land to the north of Huffey Street to be subdivided down to 450m². The Rural Residential Subzone enables subdivision generally down to 2 ha but also goes down to 5,000m² along Davies Street and Tripp Street.

The proposed development will have an average lot size of 6,192m² or 7,700m² depending on whether Lot 1 is included in this calculation or not. If approved, the development will provide an appropriate transition of lot size from the 2 ha minimum lot size in the adjoining Rural Residential Subzone to the lower density lots in the Residential 1 zone along Gresham Street and the General Residential Zone on Huffey Street. Visually, this will likely be interpreted as a transition from suburban to rural residential.

The argument brought about by the Agent is that the development provides an intermediary average allotment size of 6,192m²-7,700m² that lessens the scale of the area change between the Rural Residential Sub Zone to the north of the site (minimum allotment size of 20,000m²) and the Residential 1 zone (minimum allotment size of 450m²) permitted by subdivision to a degree considerable as "an appropriate transition". While I agree in principle that this would provide an even more gradual transition between the two zones, it is ultimately not relevant to the application site because of its location relative to the Geraldine urban periphery acting as a transition between Rural 2-zoned land and Residential 1/Residential 5-land. In other words, the Rural Residential Sub Zone has been allocated a higher density because it bridges the transition between urban zones (i.e., Residential 1, Residential 5, Recreation 2) and the Rural Lifestyle Sub Zone which I note fully engulfs the Rural Residential Sub Zone as shown in Figure 5.

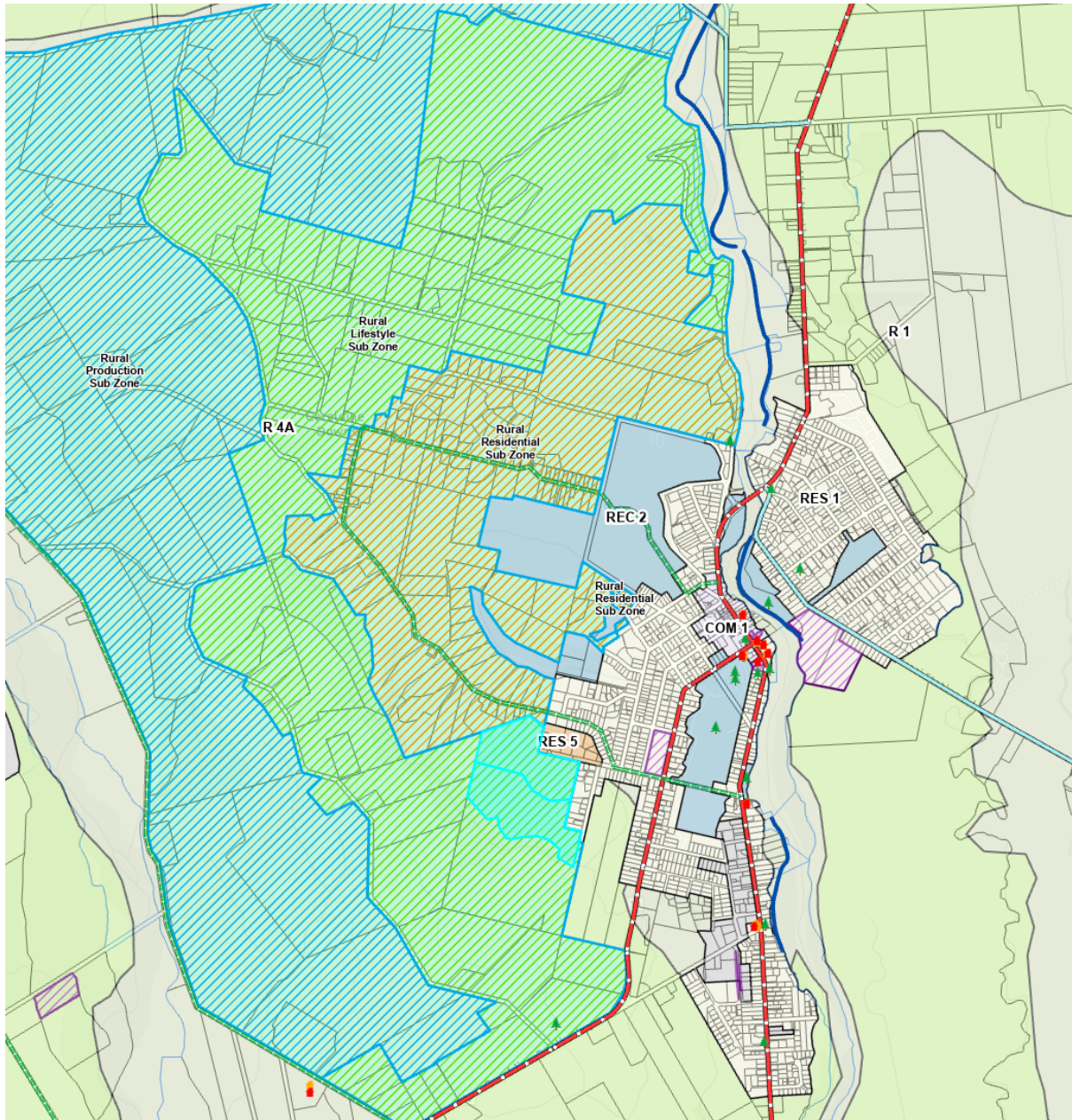


Figure 5: Extent of Rural zone interactions with Urban zones for the Geraldine township and areas of transition (Source: Council GIS).

The Rural Lifestyle Sub Zone certainly has a transitional principle – acting as a buffer between the Rural Residential Sub Zone and the Rural Production Sub Zone and/or Rural 1 and Rural 2 zones – but I cannot consider the Agent’s argument as relevant to this specific context since both the ODP, and the PDP having recently undergone a substantial review, simply does not anticipate the transition this scale of density provides. The frontage this Sub Zone has with urban land is minimal: - barring the 733m frontage this zone has with Residential 5 and Residential 1 land no other part of this Sub Zone affronts another urban boundary. This leads me to consider that this densification, denser still than Rural Residential Sub Zone is effectively a westward expansion of the urban boundary of Geraldine providing a density only exceeded by other urban zoning classifications.

Putting this to one side and returning to visual effects, although these have been determined from public viewpoints to be low in both the Glasson Huxtable LVA and the peer review, the overall character and amenity effects are considered moderate, or more than minor, in the short to medium

term under the peer review and I agree with this view. My emphasis (underlined) is deliberate because I ultimately agree with the Agent and the landscape architect's position in the LVA that the development's effects, subject to the substantial mitigation measures proposed could very well result in eventually low/less than minor effects on the receiving environment, but the scale of the change in the short term is what generates moderate/more than minor effects on views. The reliance on mitigation planting to 'greenwall' any potential views from surrounding points may well contribute to a more open rural character anticipated by this newly defined 'rural productive' to 'rural-residential' transition-zone, but until such time that these measures mature effects cannot reduce enough to be considered less than minor. I add that other 'domestic' elements that are not addressed through mitigation, e.g. transport, mailboxes, waste management trucks) cannot be screened by the planting and will still provide an 'effect' although as I discuss later are of themselves less than minor in my view.

Ultimately, I determine that the sum of these effects include a noticeable reduction in openness and rural character, a clear perception of urban expansion into the Geraldine Downs, and cumulative effects on the settlement boundary and landscape integrity. Under section 95A of the Resource Management Act, this level of effect in my view meets the threshold to be considered more than minor. The effects are more than minor and cannot be adequately mitigated in the short to medium term.

Setback Infringements

Separate to my considerations for density breaches, the proposed building platforms for Lots 10, and 13-24 are within 15 metres of adjoining notional boundaries for the subdivision. I am satisfied that these breaches are internal to the development and do not create adverse effects beyond their immediate environment.

More significant however are the boundary setback non-compliances caused by the new building platforms on external boundaries:

- New building platform on Lot 8 located approx. 7.6-metres from the boundary with 162 Greenvale Road.
- New building platform on Lot 9 located approx. 12.5-metres from the boundary with 31 Downs Road.
- New building platform on Lot 14 located approx. 6.8-metres from the boundary with 1 Huffey Street.
- New building platform on Lot 25 located approx. 5.2-metres from the boundary with 40 Gresham Street, 5.4-metres from the boundary with 34 Gresham Street, and 6.5-metres from 32 Gresham Street.

Since this is a s95D assessment I cannot consider effects on adjoining land parcels, however based on my determination above, these infringements re-emphasise the issue that the density sought by the proposal is not anticipated for the Rural 4A zone, making compliance with this performance standard difficult.

Signage

The new proposed entry signs require consent for exceeding the maximum size for signs in the Rural Zone by 0.57m² (being 3m² permitted maximum). As part of a request for further information under s92(1) of the Act, the Applicant was requested to provide an assessment of effects for the non-compliance, and a suitable response was provided by the landscape architect⁶. I am satisfied that both

⁶ RFI response received 7 November 2025 (CM9 Doc Ref 1807486).

signs will be formed from non-reflective materials (corten steel and timber) with supporting lighting and planting that will not be intermittent or overly bright in nature. As confirmed via the revised concept landscape master plan (attached to this report as Appendix C), the entry signs will be located at the intersections of the new road with Huffey Street and Gresham Street, and will not be established in a such a way that will impede driver visibility at intersections (addressed further under my assessment of transport effects). Overall, the non-compliance is small in scale and is not considered to generate adverse effects that are more than minor.

Natural Hazards

The site is not identified as being subject to any natural hazard overlays under the ODP. Under the PDP maps however the site is subject to a Flood Assessment Area (FAA) affecting the central gully and Lots 1, 2, 11, and 25. I note Lot 200 is also affected by the FAA, but this lot is proposed to be used a local purpose reserve for stormwater, and its construction will recontour the land, thereby reducing overland flows and improving drainage. For completeness I have used the revised PDP FAA mapping borne out of Hearing I *Natural Hazard Further Submissions*. Figure 6 shows both the FAA as notified under the current PDP maps (blue thatch) and the revised mapping as heard in Hearing I.

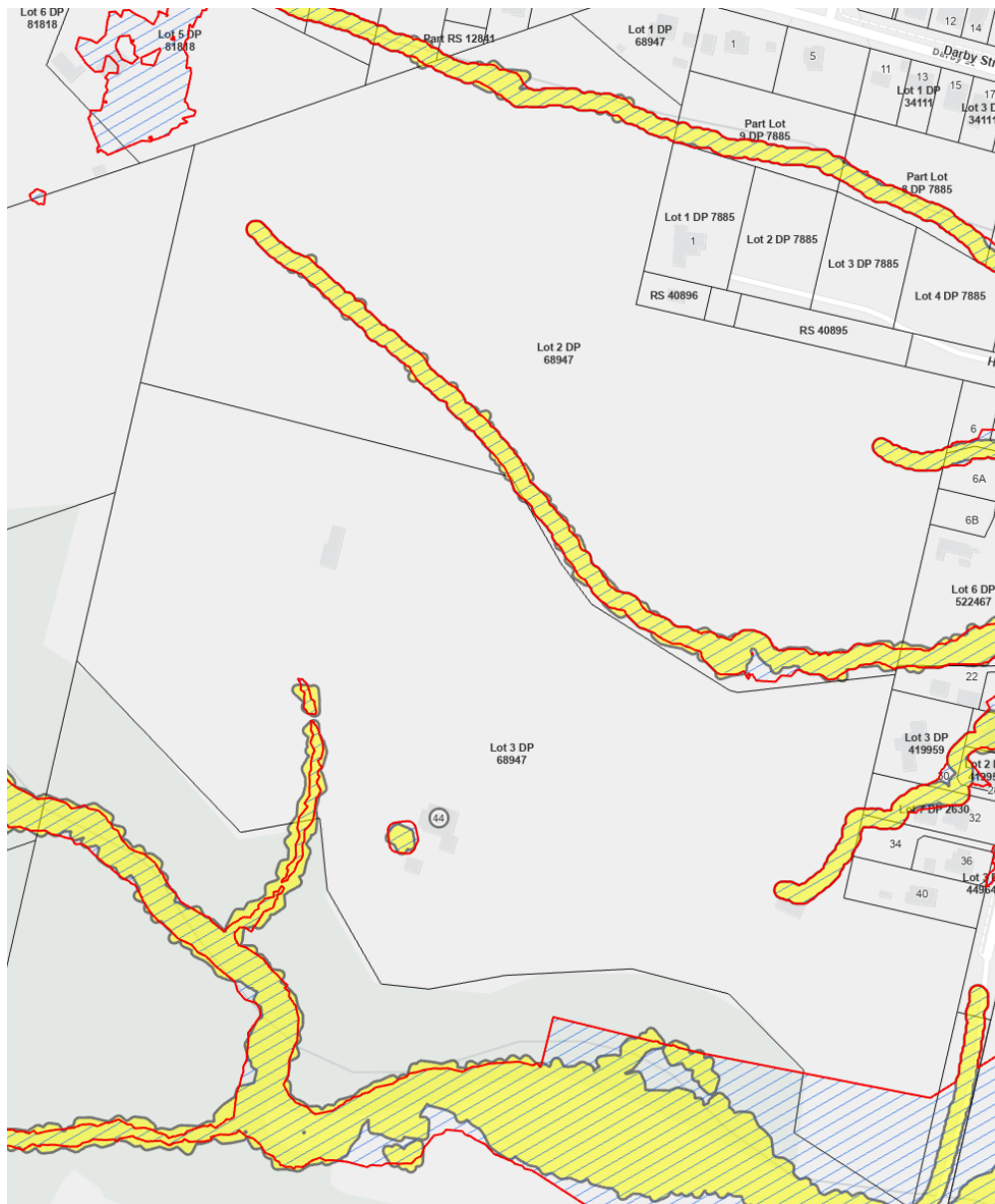


Figure 6: Flood Assessment Areas onsite. (Source: FAA Overlay Comparison Tool).

The proposed building platforms for all allotments are located outside the identified flood areas with the exception of Lot 25. The Applicant has recognised the location of the new building platform on Lot 25 relative to the FAA and volunteered a consent notice condition requiring certification that future building finished floor levels are above the 0.5% AEP flood event and that development will not displace floodwater in a manner that would adversely affect adjoining sites.

I add that stormwater discharge consent (CRC260266) has been granted by Environment Canterbury for the proposal. In that consent, the stormwater system includes on-site detention tanks ($\geq 10 \text{ m}^3$ per lot), road swales and sumps, two attenuation basins, and discharge to Geraldine Downs Creek via controlled outlets. These measures are designed to maintain hydraulic neutrality and avoid displacement of floodwaters onto neighbouring properties.

I am satisfied that the volunteered consent notice and the proposed stormwater controls qualified by the approval of CRC260266 ensure the risk from flood hazard is less than minor for the subdivision and proposed land uses.

The site's topography and proposed earthworks have been assessed for stability (geotechnical assessment under Regional Council consent), and landscaping/planting will assist with erosion control. Adverse effects from natural hazards are considered less than minor.

Cultural and Historic Heritage Effects

The application site is not identified in either the ODP or the PDP as a site or area of significance to Māori. There are no scheduled heritage buildings, archaeological sites, or listed historic places within the property boundaries. The Applicant consulted with Te Rūnanga o Arowhenua (Arowhenua) through Aoraki Environmental Consultancy Limited (AECL) prior to lodging the application. For completeness AECL is the recognised environmental management arm of Arowhenua and I welcome the pre-lodgement consultation.

AECL raised concerns regarding stormwater discharges into the central gully, and the potential need for individual wastewater discharge consents given the site's location in a red nutrient allocation zone under the Canterbury Land and Water Regional Plan. These comments are attached as Appendix 8 of the application document and Appendix D of this report. The Applicant duly addressed these concerns by securing a stormwater discharge consent from Environment Canterbury and committing to reticulated wastewater disposal, thereby removing the need for individual discharge consents. AECL also recommended additional native planting like Kāpuka or Broadleaf to improve soil stability and absorb excess surface water. These recommendations have been incorporated into the landscape plan and proposed consent conditions⁷.

No archaeological sites or historic heritage features have been identified on the property. I note that a condition of consent has been volunteered in Appendix 4 of the application to implement an Accidental Discovery Protocol (ADP) to manage any unforeseen discoveries during earthworks, consistent with the Heritage New Zealand Pouhere Taonga Act.

Overall, I consider that all effects on cultural and historic heritage values brought about by the proposed subdivision and land use are less than minor due to early engagement with mana whenua, adoption of AECL recommendations, and the inclusion of an ADP.

⁷ As confirmed via s92(1) request for further information issued 16 October 2025 (CM9 Doc Ref 1800658), with response accepted 19 November 2025 (CM9 Doc Ref 1807493).

Ecological Effects

The site is currently used for pastoral farming and contains pasture grass, hedges, and scattered specimen trees. There are no identified significant natural areas or sensitive habitats within the property. Existing ecological values are therefore limited, with low biodiversity and minimal indigenous vegetation.

The subdivision proposal includes a comprehensive landscape plan that will significantly improve ecological values (as attached in Appendix 6 of the application document). The plan requires the planting of indigenous species sourced from the Geraldine Downs Native Bush Areas Species List or the Talbot Forest species list. Each lot will be required to establish a minimum of four trees capable of reaching eight metres in height at maturity, with at least two of these trees planted within the six-metre road setback. In addition, bunds and boundary plantings will incorporate native shrubs and trees to provide habitat and connectivity for local fauna, as shown in Figure 7. The stormwater reserve and gully areas will also be planted with native vegetation, contributing to riparian enhancement and improving water quality through natural filtration. These measures will create ecological corridors and increase biodiversity within the Geraldine Downs landscape.



Figure 7: Concept landscaping plan for subdivision (Source: Appendix 6, Application Docs).

TREES & LARGE SHRUBS



PLAGIANTHUS REGIUS

PSEUDOPANAX ARBOREUS

SOPHORA MICROPHYLLA

CARPODETUS SERRATUS

PODOCARPUS TOTARA



PSEUDOPANAX CRASSIFOLIUS

MYRSINE AUSTRALIS

KUNZEA ERICOIDES

PITTOSPORUM EUGENIODES

PITTOSPORUM TENUIFOLIUM

HOHERIA ANGUSTIFOLIA

SMALL SHRUBS & GROUNDCOVERS



MUEHLENBECKIA ASTONII

PHORMIUM TENAX

GRISELINIA LITTORALIS

LOPHOMYRTUS OBCORDATA

COPROSMA CRASSIFOLIA



CAREX TESTACEA

LIBERTIA IXIODES

CHIONOCHLOA RUBRA

POA CITA

ASTELIA FRAGRANS

I agree with the Applicant that the proposed subdivision will result in a net ecological gain. While the existing environment is dominated by exotic pasture, the introduction of native planting will enhance habitat diversity, support indigenous species, and contribute to the wider ecological network. I note the Agent has also volunteered a consent notice condition (19) requiring the minimum number of trees planted and for all future landscaping on each of the allotments to be subject to approval from a full member NZILA landscape architect. The proposal will have positive ecological effects by increasing indigenous vegetation cover, improving habitat connectivity, and supporting biodiversity values.

Infrastructure

Attached as Appendix 9 of the application document is a Development Capacity Assessment (DCA) from WSP, dated 2022, that was commissioned by Council for the consent processing of 101.2023.94.1. I have attached the DCA to this report as Appendix E. That model was based on a future

20 rural-residential allotment development. Commensurate with the additional five rural-residential allotments proposed under this consent, the Applicant has engaged Davis Ogilvie to produce an Engineering Services Memorandum (ESM) that details the proposed servicing for the subdivision based on the initial modelling results from the DCA. The following assessment incorporates the DCA, the additional information provided by the Memorandum, and comment from Council's Infrastructure Unit. I have attached the ESM to this report as Appendix F.

Water Supply

The subdivision is located at a high elevation, which requires careful consideration of water pressure and firefighting capacity. The ESM identifies four servicing options: extending the watermain from Darby Street and utilising the Hewlings Street booster pump station (preferred), installing a pump station at Huffey Street (not preferred), installing a pressure valve at Huffey Street (requires modelling), or providing a restricted supply with onsite tanks for firefighting. The preferred option would require an easement and pipe upgrades, including a DN180 PE100 PN12.5 connection at Darby Street. Hydraulic modelling from the DCA confirms that this option can service the development without adverse effects on the wider network, while alternative options would require additional infrastructure and further detailed modelling.

The DCA confirms that the existing network has firefighting water supply/pressure deficiencies, with some hydrants unable to meet FW3 requirements. While the Hewlings Street booster can service the development, ultimate growth scenarios for Geraldine show significant pressure drops and head losses, requiring approximately 3.8 km of mains upsizing and potentially a larger reservoir in the future. Peak flow for all planned growth remains within the consented water take limit of 80 L/s, so the subdivision itself does not breach allocation limits. The Applicant has volunteered a condition of consent that future engineering design for water supply be approved prior to s224(c) certification, and I am satisfied this can be remedied at that time.

Wastewater

The proposed wastewater system will comprise a combination of gravity and low-pressure systems discharging into the existing Council reticulated main within Huffey Street and Gresham Street. The majority of the network will be gravity-fed along the new road corridor, with pressure boundary kits installed where required. The ESM confirms that the design will comply with Council's Infrastructure Design Guidelines and NZS 4404, with final details to be confirmed at engineering approval stage.

The ESM further notes that no significant downstream capacity issues are expected for this subdivision, citing Mr Kevin Kemp (Council's Stormwater Team Leader) as affirming this view. For completeness, DCA modelling indicates that the development will exacerbate existing surcharging and manhole overflow volumes during storm events, but the change relative to existing surcharge volumes is minor. Spill volumes at COXS-MH06045 could increase from 12 m³ to 66 m³ under ultimate growth scenarios, requiring approximately 6.1 km of network upsizing to mitigate cumulative effects⁸. For this subdivision alone, effects are considered less than minor provided all lots connect to the reticulated network via independent laterals and compliance evidence is provided at Section 224(c). Long-term cumulative effects will require Council-led network upgrades and inflow/infiltration reduction measures.

Stormwater

Stormwater consent (CRC260266) has been granted by Environment Canterbury for disposal from the subdivision. The system includes on-site detention tanks with a minimum storage of 10 m³ per lot before discharge, road sumps, swales, and pipes, two attenuation ponds, and a recontoured central

⁸ See Figures 3-4 and 3-5 of WSP Development Capacity Assessment (pp.11-12).

gully. Discharge points are to Geraldine Downs Creek via golf course land and the gully at 18 Gresham Street. Water-sensitive design principles have been applied, and volunteered consent conditions (17) prohibit copper or unpainted galvanised roofing and require hydrocarbon traps in sumps.

The gully is identified as a flood risk area in the PDP but this has already been discussed under the assessment of effects from natural hazards for the site. Engineering design mitigates this through recontouring, bunds, and detention basins sized for a 1:50-year, 24-hour event.

Overall, upon a compliant design certified at engineering approval, effects on Council's reticulated infrastructure are considered minor.

Transportation Effects

Existing Transport Environment

The site fronts Gresham Street and connects to Huffey Street, both classified as local roads under the District Plan Road Hierarchy. As part of the application, the Agent has supplied an Integrated Transport Assessment from Abley Engineering Services to address the transportation aspects of the proposed development. I have attached the ITA to this report as Appendix G for reference.

According to the ITA, Gresham Street has an average daily traffic (ADT) of approximately 165 vehicles⁹ per day, a 50 km/h speed limit, and a 7-metre carriageway with a footpath on one side. Huffey Street carries around 914 vehicles per day and is 12.5 m wide with a footpath on its northern side. Crash data from 2015–2025 shows only one non-injury crash at the Huffey/Cox Street intersection, indicating no significant safety deficiencies. There are no dedicated cycle facilities, but low traffic volumes support safe cycling. Pedestrian connectivity is reasonable, with footpaths linking to Geraldine Primary School and local amenities within 1 km of the site. I note there is no public transport in Geraldine.

Proposed Roading and Access

The subdivision includes a new internal road linking Gresham Street and Huffey Street. The road will have a legal width of 20 m for the first 100 m from Gresham Street and 17 m for the remainder, with a 7 m carriageway, 1.8 m footpath on one side, and grassed berms. This design exceeds NZS 4404:2010 standards for suburban roads despite the non-compliance for new road dimensions under Part D6.6, Table 6.6.2(5):

Classification	Sub Classification	Type of Street	Development Served	Minimum Total Access	Private	Recommended and Footpath Combined	Berm Width	Minimum Carriageway Combination	Carriageway Total
Local (Rural)		Private access	Up to 7 hu and/or lots	8.0		2 x 2.5 ¹		3.0	3.0
		Local road	Greater than 7 hu and/or lots	20.0		2 x 7.0 ¹		6.0	6.0

A cross-section of the proposed road profile is provided below as Figure 8:

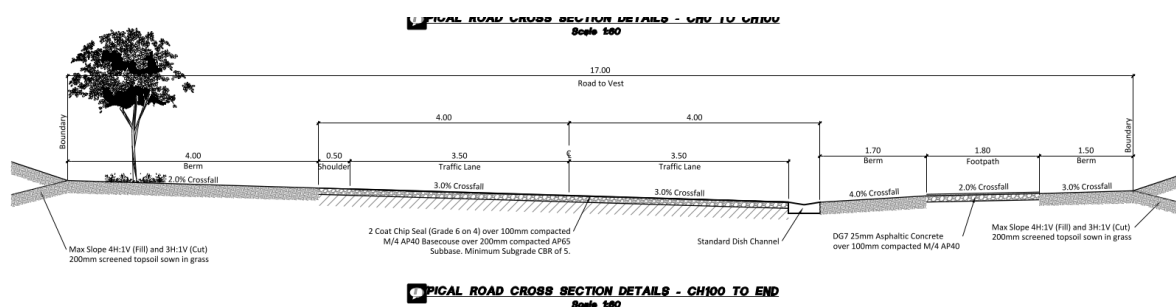


Figure 8: Cross-section for 17-metre-wide road section (Source: Appendix 13 of Application Docs).

⁹ See p. 11 of Abley Integrated Transport Assessment.

For completeness, I note the application only provides for one footpath, which is also different from the recommendation set out in Table 6.6.2(5). The ITA has considered this and confirmed that the design is consistent with the New Zealand Transport Agency's Pedestrian Guidance document stating "a preference for footpath[s] on one side where density is less than three dwellings per Hectare (the development is approx. 1.5 dwellings per Ha)"¹⁰.

In addition to the new road, Huffey Street will be upgraded to public road standard with a 6-metre-wide carriageway, 2-metre-wide footpath on the southern side, and improved drainage. Intersection priority will be given to Huffey Street to optimise sight distances, and tactile pavers will be installed for pedestrian safety.

All lots will have legal and physical access; with Lots 2–4 sharing an 8-metre-wide private access wide burdened by Lot 4. 6-metre x 6-metre visibility splays have been provided at intersections either by a splay outright, or placement of the entry sign to the development as shown at Figures 7.1 and 7.2 of the ITA. I note that this is an identified non-compliance against performance standard 6.3.11(2) of General Rule 6.3 (subdivision), for which this is assessed in the ITA as follows:

7.2 6.3.11 (2) – Intersection Corner Boundary Splays

Rule 6.3.11 requires that where a corner allotment is included in any subdivision the corner shall be cut off to a distance, along the road frontages, of not less than 15 metres from the intersection and vested as road.

Since the subdivision is more akin to a large lot residential development, the residential design standard has been considered from an effects perspective. This requires a lesser corner splay of 6.0m x 6.0m.

In that regard, it is noted that 6m x 6m visibility splays can be provided on both sides of the Gresham Street intersection access and the Huffey Street intersection access.

In both cases an entry sign with landscaping is designed such that this visibility splay is achieved on one side of each access with matching visibility splay also included on the opposite side. It is recommended that only low planting be included on these splays to maintain excellent intervisibility between pedestrians and vehicles. It is further recommended that the land can be vested in road reserve subject to agreement between the developer and Council, but entry signage be located outside of the vested land.

Land Transport Unit have confirmed that vesting this land as road reserve removes the risks of structures/planting being located within the splay and creating a visibility risk¹¹.

Beyond the matters considered in the ITA, Council's Land Transport Unit requested clarification on how stormwater flowing down the new road would be dealt with to reduce the effect of scouring on the proposed swale, the unsealed shoulder, and across the Gresham Street carriageway¹².

Of the volunteered solutions mentioned in the RFI response, Council's Infrastructure Planner Mr William Ching confirmed that "Land Transport would require the first option of including dish channel and sump(s)" and that a similar "dish channel (or equivalent) along the uphill side of the road" would be required as scour protection for the seal¹³.

¹⁰ See p. 8 of Abley Integrated Transport Assessment, referencing New Zealand Transport Agency Sec. 3.3.1c Table 1 of Pedestrian Network Guidance Document.

¹¹ See Infrastructure Planner email correspondence (CM9 Doc Ref 1808808).

¹² See points 9 and 10 of request for further information issued to Applicant 16 October 2025. See CM9 Doc Ref 1800658.

¹³ See Land Transport Unit comment on RFI response received 21 November 2025. CM9 Doc Ref 1808734.

On the condition that these solutions be implemented as part of a future engineering approval application I am satisfied that the potential for scouring, and subsequent adverse effects is suitably considered and mitigated.

Traffic Generation and Effects

The 24 new dwellings (Lot 1 contains an existing house) are expected to generate approximately 197 vehicle trips per day and 22 trips during the peak hour, equating to one additional vehicle every three minutes at peak times. While this represents a notable increase compared to existing volumes, the ITA concludes that the local road network can safely and efficiently accommodate this traffic. The subdivision will not compromise the safety or efficiency of the surrounding network, and I am satisfied traffic generation from the new development in conjunction with the proposed road upgrades generate less than minor effects.

Council's Land Transport Unit have assessed the modelled vehicle movements on the proposed road and the surrounding network and are satisfied with the conclusions made in the ITA¹⁴.

Construction Traffic

Construction activities will temporarily increase heavy vehicle movements. To mitigate potential conflicts near Geraldine Primary School, a Construction Traffic Management Plan (CTMP) has been recommended in the ITA, including restrictions on construction traffic during school pick-up and drop-off times. I am satisfied that subject to an approved Construction Management Plan incorporating traffic management controls that construction traffic effects would produce only minor effects.

Active Transport and Connectivity

The proposal includes a 1.8-metre footpath along the new internal road and upgrades to Huffey Street to improve pedestrian connectivity. While no cycle lanes are proposed, low traffic volumes and the subdivision's proximity to existing and planned walking/cycling routes support safe active transport. I note that the Applicant has requested the financial contribution of \$5,000 per lot to be deferred until Building Consent. Irrespective of the time at which that payment is made, the contributions will fund off-road walking and cycling tracks in the Geraldine Downs area, further enhancing connectivity. I discuss the effects of the financial contribution deferment later in this assessment.

Conclusion

The subdivision is supported from a transportation perspective. The proposed road design meets or exceeds relevant standards, and the subdivision will integrate effectively with the existing network. I note that although overall safety, access, and connectivity will be maintained or improved through the proposed design, the potential for adverse effects remains unless mitigated by future conditions of consent that incorporate the ITA recommendations. For the purpose of this notification assessment however I am satisfied transportation effects on the wider environment are less than minor.

Earthworks and Construction Effects

Earthworks are required for the formation of the new road linking Huffey Street and Gresham Street, installation of infrastructure services, and the construction of stormwater ponds. Approximately 21,000–25,000 m³ of material will be moved, with roading earthworks covering 3.6–4 hectares. These activities will temporarily generate effects such as dust, noise, and potential sediment runoff. As part of a request for further information issued under s92(1), the Applicant was asked to outline what controls would be put in place for these to be assessed and included as part of a potential consent package of works. The Applicant refused on the basis that this detail would be provided as part of a volunteered condition to provide Council with a Construction Management Plan (see condition 3 of

¹⁴ See email correspondence from Infrastructure Planner (CM9 Doc Ref 1808808).

volunteered conditions attached as Appendix H), and that Regional Council Consent CRC260266 included construction-phase stormwater discharges as part of its scope.

Considering this, I am satisfied that particulate discharge offsite via stormwater runoff is adequately controlled by the Regional Council consent, and any airborne particulate discharge can be monitored via controls as part of the Construction Management Plan.

Given the scale of works and the mitigation proposed, any adverse effects on the environment during construction are expected to be temporary and minor, noting the volunteered mitigation measures in accordance with the Construction Management Plan and the obligations under CRC260266.

Step 4 - Public Notification in Special Circumstances s95A(9)

In this case, public notification is not required under Step 4 (section 95A(9)) as it is considered that there are no special circumstances that exist in relation to the application.

5.2 Limited Notification (Section 95B)

Public notification of the application is required pursuant to s95A of the RMA. An assessment of Steps 1 to 4 under section 95B of the Act is therefore not required.

5.3 Conclusion

Having assessed the application for subdivision and land use consent pursuant to sections 95A-95G of the Resource Management Act 1991, it is recommended that the application be processed on a publicly notified basis. The density sought by the subdivision is significantly contrary to that anticipated for the Rural 4A Rural Lifestyle Sub Zone and is ultimately a westward expansion of the urban boundary of the Geraldine township. Although extensive measures (planting, building platform locations away from ridgelines, non-reflective finishes etc.) have been incorporated in the design proposal to mitigate the effects of the density non-compliance on both surrounding land parcels and views of the site from the township more generally, the short to medium term effects of the proposal cannot be considered less than minor for the reasons outlined earlier in this assessment.



Patrick O'Toole
Intermediate Planner

Date: 27 November 2025

6. NOTIFICATION DETERMINATION

I have reviewed the recommendations and reasons outlined in the Notification Recommendation report prepared by Mr Patrick O'Toole, Intermediate Planner, of the Timaru District Council. I agree with those reasons and recommendations and adopt accordingly.

I determine that the application is to be processed on a publicly notified basis in accordance with sections 95A to 95G of the Resource Management Act 1991.

This decision is made under delegated authority by:



Allan Cubitt
Independent Hearings Commissioner

Date: 27 November 2025