

7 November 2025

Timaru District Council

By: Email: patrick.otoole@timdc.govt.nz

Attention: Patrick O'Toole

Dear Patrick,

**RE: RESOURCE CONSENT APPLICATION 101.2025.119.1 & 102.2025.119.1
YEDO INVESTMENTS LIMITED, 44 GRESHAM STREET, GERALDINE
RESPONSE TO FURTHER INFORMATION REQUEST**

This letter responds to your further information request dated 16 October 2025. It provides each item of your further information request in bold italics below and then provides the applicant's response to that item.

- 1. Following a site visit, the potential for a number of additional views from within the Geraldine township were identified which have not been addressed. Can the landscape architect who prepared the Landscape and Visual Assessment of Effects (LVA) confirm the visual effects of the proposal from views on Tiplady Road, North Terrace Road, South Terrace Road, and Cox Street (meaning within proximity of the intersection between Cox Street and Talbot Street).***

Response

The applicant's landscape architect's response to this request is that:

"A desktop assessment using Google Earth has been completed of the visual effects from the streets listed above. The anticipated adverse effects are as follows:

- Tiplady Road – Very Low (less than minor)*
- North Terrace Road – Low (less than minor)*
- South Terrace Road – Low (less than minor)*

- Cox Street (in proximity to the Cox and Talbot Street intersection) – Very Low (less than minor)

2. Can the landscape expert please provide a rationale for why the following properties were deemed to not be adversely affected by the proposal:

- a. 31 Downs Road
- b. 19 Darby Street
- c. 34 Gresham Street
- d. 1 Huffey Street

Response

The applicant's landscape architect's response as to why the above listed properties were not deemed to be adversely affected by the proposal is:

"Visual Effects from the above neighbouring dwellings have been assessed in Section 8.4 Visual Effects from Neighbouring Dwellings of the Supplementary Landscape and Visual Assessment of Effects (LVA), September 2025, Revision 4 (referred to as "the Table"). Comments on each of the above dwellings are made as follows:

- 31 Downs Road – *As demonstrated in the Table, it was anticipated that adverse visual effects experienced at this dwelling would be very low (less than minor) in years 1-2 and very low (less than minor) in year 5. However, upon further reflection, we consider that the interim visual effects will be low (minor) in Years 1-2, reducing to very low (less than minor) once the proposed boundary vegetation has matured and screens the proposed dwellings.*
- 19 Darby Street – *This property should be assessed as part of the cluster associated with 33-17 Darby Street (the Table should read 33 -19 Darby Street). The adverse visual effects are assessed as low (less than minor). This rating reflects the semi-rural context and the low-density residential development anticipated under the District Plan for the adjacent lot, which is considered part of the existing environment.*
- 34 Gresham Street - *This vacant lot was assessed in the Table within the cluster of dwellings relating to 34 and 36 Gresham Street. Adverse visual effects are anticipated to be low (less than minor) in years 1-2 and very low (less than minor) in year 5. Initially, there will be a narrow, background view of the proposed dwelling at Lot 25. The existing boundary vegetation will soften the roofline of the proposed dwelling, if visible, with adverse visual effects reducing as*

the new boundary planting matures and fills the gap. We have now been advised that written approval has been obtained from the owners of 34 Gresham Street.

- *1 Huffey Street – In the Table, the initial adverse visual effects in years 1-2 were anticipated to be low to moderate. Using the Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines seven-point scale, this equates to **minor** effects. The Table erroneously adds “less than minor” in brackets for years 1-2. The anticipated visual effects at year 5 are correctly identified as low (minor).*

We note that a visual assessment from the dwelling at 19 Downs Road was unintentionally omitted from the LVA. This property would fall within the cluster associated with 9-17 Downs Road (the Table should read 9 – 19 Downs Road). For the reasons outlined in the Table, adverse effects experienced at this dwelling are anticipated to be low to moderate (minor). The Table has been updated to reflect the above changes and is appended to this memo.

3. Building platforms have been indicated in the supplied Concept Masterplan (Appendix 3). Regarding these platforms, can you please confirm:

- a. What will the size of the building platforms be, and will this vary across the proposed allotments? If yes, please provide the area and dimensions of each building platform across all 25 allotments.***
- b. Given the sloping nature of the site, will the proposed platforms follow the existing terrain, or be cut into the hillside?***
- c. Will there be a maximum building footprint within the building platforms, or is the total area of platform the most visually dominant expected built form?***
- d. Will curtilage such as accessory buildings, washing lines, patios etc. be contained within the building platforms, or will the area nominated as building platform be exclusively for the principal dwelling onsite?***

Response

The applicant's landscape architect's response to this request is that:

- a. “The area of each building platform is 800m² (40 x 40m).*
- b. The building platforms will follow the terrain. The extent of cut and fill will be decided by the future owners and dependant on individual preferences. The maximum building height of 6m will be required to be met.*

- c. *No maximum building size is proposed. However, a maximum building footprint of 350m² (including dwellings, accessory buildings, roof overhangs, and any other structures) is considered appropriate. This aligns with maximum building limits applied to other comparable subdivisions in sensitive locations with which we have assessed.*
- d. *All structures including accessory buildings, washing lines, patios and similar structures will be located within the nominated building platform area”.*

The building platform areas will not vary across the site.

The applicant is happy that the above parameters are included in the conditions.

- 4. *The LVA includes a comprehensive list of recommendations, however it is unclear whether these have been taken into account as part of the assessment. Can the landscape expert please confirm whether these recommendations form part of the assessment and proposed application?***

Response

The applicant's landscape architect's response to this request is that:

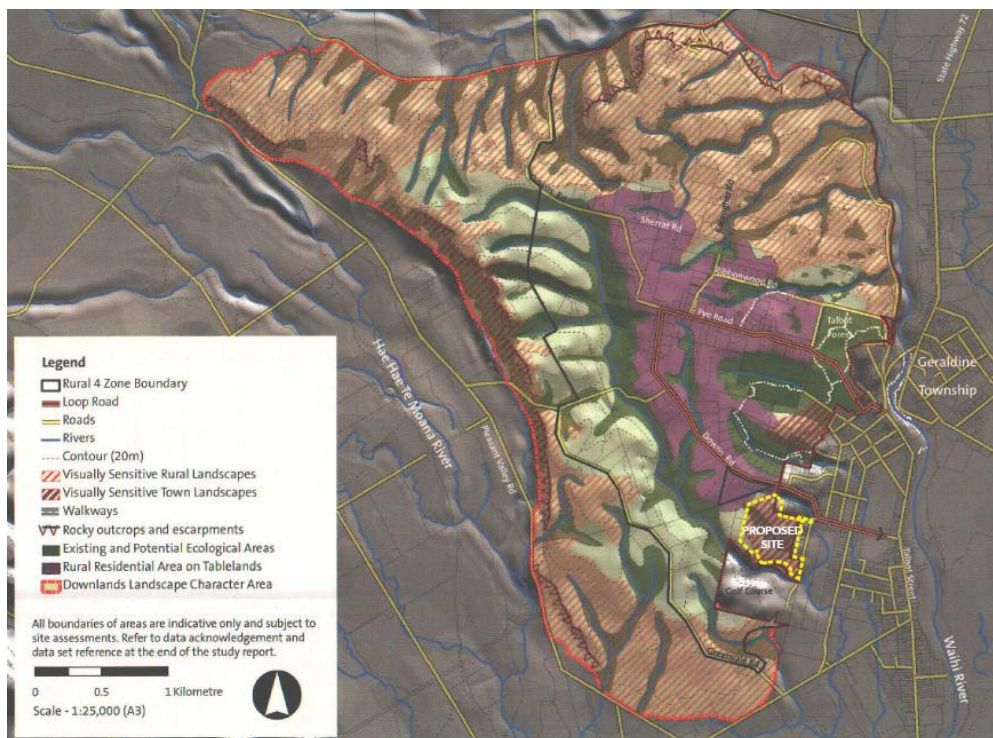
“It is understood that all recommendations made within the LVA have been adopted by the applicant. The recommended mitigation measures have been factored into our assessment and assessment ratings.”

- 5. *What are the cumulative effects of domestication on the Geraldine Downs Visually Sensitive Town Landscape?***

Response

The applicant's landscape architect's response to this request is that:

“The Visually Sensitive Town Landscapes is shown in the Geraldine Downs Landscape Study prepared by Boffa Miskell in July 2008. We note that it does not form part of the Operative District Plan. For reference, it is shown in Section 8 of our Graphic Supplement, with a copy included below:



Due to the close similarity of the red hatches used, section 8.1 of the LVA, incorrectly identified the site as being in the ‘Visually Sensitive Rural Landscape’. The site is instead part of the ‘Visually Sensitive Town Landscape’. The development proposed looks like it would occupy approximately half of this area, which is on the flanks of the hillside. The assessment conclusions made still stands”.

- 6. Within the table under section 8.4 of the LVA it is noted that 1 Huffey Street is described to experience a low moderate adverse visual effect. This has been described as less than minor. According to the methodology in Appendix 1 of the Landscape and Visual Effects Assessment and Te Tangi a Te Manu this should equate to minor. Can the landscape expert please confirm the notification status of the property.**

Response

Refer to the response to question number 2 above.

- 7. Please provide an assessment of the two proposed entry signs against the provisions in General Rule 6.15 of the Operative District Plan.**

Response

Rule 6.15.2.1 list “signs showing road names” as a permitted activity, subject to the Performance Standards for the zone and the General Rules. There are no performance standards in the Rural 4A zone that apply noting that its setback standards apply to buildings, which the sign is not. There are no other general rules that apply. The performance standards under 6.15.2.8 are not referred to under Rule 6.15.2.1 and therefore do not apply. In the instance you have a contrary view, we note that section 4.0 of the AEE states that:

“Resource consent is sought for any consents required to authorise the activities described in the proposal section of this report, including any attached plans and reports, and whether the specific consent requirement have been identified below or not.”

The applicant’s landscape architect response to this request is:

“Two proposed feature entry signs with the words ‘Whakarua Place’ are proposed at the Gresham and Huffey Street subdivision entrances (refer to landscape plans by Innate Landscape Architecture). Each sign is approximately 2.1m high x 1.7m wide and constructed of Corten steel and timber, with supporting lighting and planting.However, having regard to the performance standards in section 6.15.28 of the Plan, the proposed signs are considered appropriate for the following reasons:

- The signs relate directly to the site, displaying the subdivision name.*
- The text size is appropriate for wayfinding.*
- Only one sign is proposed on each road frontage, with sufficient separation to ensure they are not read together.*
- The signs and associated feature poles and landscaping will be located on private land (outside the road reserve) and set back at least 6m from the road intersections to avoid obstructing pedestrian or vehicle sight lines.*
- Any low-level planting within the visibility triangle will not exceed 0.6m height, ensuring clear sight lines.*
- No traffic signs or signals will be obstructed or obscured, nor will the signage be confused with traffic signals.*
- No reflective, intermittent or moving lights are proposed.*
- The signage has a natural appearance. The Corten steel is engineered to weather to a rust-like patina, and the colour and texture of the timber and Corten will blend with the semi-rural context.”*

8. What are the nature and scale of temporary effects associated with the road construction including earthworks? How will these earthworks be treated including a timeframe of works?

Response

The nature and scale of earthworks are described in Section 3.4.3 of the AEE submitted with the application, which states that earthworks will be required for:

- formation of the road between Huffey Street and Gresham Street
- deposition of fill near the top of the catchment to ensure the road has a suitable gradient
- the creation of building platforms within the lots
- the installation of infrastructure services associated with the subdivision
- the creation of the stormwater ponds
- reshaping of parts of the central gully to ensure it is suitable for stormwater conveyance

Also as stated in the AEE, it is estimated that the area of earthworks required for the road is 3.6 to 4 ha and the approximate volume cut is 21,000m³ to 25,000m³ based on the current road layout and profile.

In terms of the nature of temporary effects associated with the road construction, there will be noise, visual, erosion and sediment effects.

In terms of the scale of noise effects, the applicant is happy to accept a condition of consent requiring compliance with the *New Zealand Standard 6803P:1984. The measurement and assessment of noise from construction, maintenance, and demolition work*.

The scale of visual and landscape effects are addressed in the landscape and visual assessment submitted with the application.

Erosion and sediment control measures are discussed below under item 9.

The applicant is not in a position to estimate the time for the earthworks given that consent has not been granted, detailed design drawings have not been developed and construction tenders (including time estimates to conduct earthworks) have not been received. Notwithstanding, it is anticipated that earthworks will be generally undertaken in accordance with the staging of the subdivision and will be completed over several weeks.

9. Please outline the erosion and soil control measures to be implemented during the construction phase of the proposal so these can be assessed and included in the consent package.

Response

The erosion and sediment control measures to be implemented during the construction phase of the development are outlined in Appendix 11 of the AEE, which states that:

“Earthworks shall be undertaken in accordance with the Environment Canterbury Erosion and Sediment Control Toolbox for Canterbury. Compliance with the procedures set out in this toolbox should be sufficient to manage the risks from sediment and erosion during the excavation works. As a minimum the following control measures will be undertaken:

- effort shall be made to undertake the excavation works in a period of dry weather to minimise the risks of stormwater entering the excavations or contaminated water escaping from the excavations;*
- erosion and sediment controls shall be put in place around the excavations as necessary to inhibit soil/sediment from being transported away from the area;*
- trucks used to transport soil offsite must be covered.”*

Compliance with the Construction Management Plan provided as Appendix 11 of the AEE is required by proposed Condition 3 that states:

“All construction activities associated with the proposed subdivision must be undertaken in accordance with the Construction Management Plan set out in Appendix 11 of the Assessment of Effects on the Environment, prepared by Perspective Consulting (dated 23 September 2025) which was submitted with the subdivision and land use consent application (Council reference XXXX).”

Accordingly, we consider that application makes suitable provision to manage erosion and soil effects. We also note that the applicant has obtained a discharge consent from Environment Canterbury under Ref. CRC260266 for the discharge of construction phase stormwater and therefore the main issue with soil and sediment control has been addressed and is outside the consent authority's jurisdiction. We also consider that providing more detailed information on this matter at this stage is inappropriate considering that consent has not been granted and therefore it would put the applicant to a lot of expense detailing the exact sediment and erosion control measures, which can simply be provided at a later stage.

10. Please provide an earthworks heatmap that outlines the spatial distribution of cut/fill volumes across the site. This is requested to better understand the changes in ground levels across the site. For example, the road cross-section at chainage 600.0 of drawing XS02 in Appendix 13 show a vertical change of 4 metres in ground level and would be a significant change in the existing environment's topography.

Response

Please find attached an earthworks heat map. We confirm that the landscape assessment has address the earthworks illustrated in the heat map.

11. Can you please confirm how any stormwater coming down the proposed road on to Gresham Street will be dealt with to reduce the effect of scouring of the swale/movement across the Gresham Street carriageway.

Response

The applicant's response to this request is that there are two options to reduce scouring of Gresham Street carriageway. This preferred engineering solution is to extend the dish channel all the way to the intersection of Gresham Street and the proposed road, incorporating a sump to collect runoff, with discharge via a kerb outlet to Gresham Street. Alternatively, a treatment similar to the existing driveway could be adopted, incorporating landscaping and gravel, as shown below, allowing flow via the vehicle crossing wings. This can be addressed during the Engineering Approval phase.



12. In areas across the site of steep topography, please outline what mitigation measures will be included in the design to mitigate damage caused to the unsealed shoulder.

Response

The applicant's response is that the road shoulder can be designed to be sealed to mitigate the scouring issue. Full details of the road design will be submitted for Council approval through the engineering approval process.

13. Council does not consider a consent notice to be the most appropriate mechanism to defer the payment of the financial contributions due under Part D6.5, Rule 6.5.2.2(5)(b) of the Operative District Plan. If the Applicant wishes to defer payment, please outline an alternative means of deferral (e.g. developer agreement) for consideration.

Response

We note that matter is not a further information request but a request to change the application, which is not provided for under the RMA. We consider the proposed consent notice is an appropriate mechanism as it delays the payment until the time of building consent.

Requiring the financial contributions to be paid at the time of building consent was proposed because at that stage it would be clear that a dwelling would be constructed on the site, after which

it would create a demand for the walking/biking and ecosystems services that the financial contribution relates. The issue with requiring the financial contribution to be paid at to s.224(c) stage is that there would be no guarantee that the lots will be sold and therefore no guarantee that there would be a demand created for walking/biking and ecosystems services that the financial contribution relates. Therefore, the consent holder would have bear the significant costs and financial risks of paying that financial contribution without any guarantee that they would be compensated for that through the sale of the allotments. Further, it could take a number of years for the lots to be sold in which case the consent holder would have to bear the interest charges on that money.

If the Council is concerned in principle about a financial contribution being deferred to the landowner, it should be noted that all costs of the subdivision, including a financial contribution, will be transferred to the final landowners through the price of each allotment.

We consider that the time and expense of preparing a developer agreement would not be cost effective.

We also note that Rule 6.5.2.2(5)(a) of the District Plan is unclear as to the timing of the payment of the financial contribution. It refers to at the time of resource consent or building consent for a new dwelling that does not need resource consent. 'At the time of resource consent' is interpreted that a condition is imposed at the time of resource consent to ensure the payment of a financial contribution is made. A financial contribution cannot be paid at the time the application is lodged, it must be after. Rule 6.5.2.2(5)(a) does not refer to the payment being made at time of s.224(c) certification but does allow the financial contribution to be paid at the time of building consent for a dwelling that does not need resource consent. While the dwellings on the site will need resource consent and therefore do not strictly meet this exemption, the proposed deferral of payment until building consent is not inconsistent with Rule 6.5.2.2(5) that provides for some payment to be made at building consent stage.

Ultimately, the proposed consent notice condition ensures payment of the financial contribution and is consent with Section 18A of the RMA that requires every person exercising powers and performing functions under this Act must take all practicable steps to use timely, efficient, consistent, and cost-effective processes that are proportionate to the functions or powers being performed or exercised. The proposed consent notices are the most cost-effective process to ensure the financial contribution are paid. It is our understanding that Council does not have an urgent need for the money.

14. Condition 5 of resource consent 101.2022.71.1 potentially affects the walking and cycling network brought about by Plan Change 17 as set out in Part D1, Section 1.11.4A, Appendices 1 and 2 of the Operative District Plan. Please confirm how the delivery of this project will be affected by the proposal.

Response

The applicant does not intend to implement resource consent 101.2022.71 and therefore the walking/cycling track will not be established on the site.

We trust that our response to your further information request is satisfactory. In the instance that clarification is required please do not hesitate to contact us.

Kind regards,

Perspective Consulting



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