



Timaru District Council  
2 King George Place  
Timaru 7910  
Phone: 03 687 7200

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

Clause 8 of Schedule 1, Resource Management Act 1991

Further submissions close on ~~Friday 4 August 2023~~ at 5pm

To: Timaru District Council

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

**Full name of person making further submission:**

Bruce and Sharon Robertson

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

Click to enter text.

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

I am:

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

Please explain why you come within the category selected above:

We are property owners in an area requesting rezoning by the Timaru District Council with the Proposed District Plan.

### Hearing options

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

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

Yes  No

Signature: Bruce Robertson Date: 10 August 2023

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

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

Electronic address for service of person making further submission: [bruce@avtek.co.nz](mailto:bruce@avtek.co.nz)

Telephone: 021324539

Postal address (or alternative method of service under section 352 of the Act): 40 Bennett Road, RD 22, Geraldine, 7992.

Contact person: *[name and designation, if applicable]*: Bruce Robertson

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

Yes  No

A handwritten signature in black ink, consisting of a large loop followed by a few strokes, is written over the signature line.

Further submissions close on Friday ~~4~~ August 2023 at 5pm.

**Additional template for multiple further submission points**

Name of person making further submission: Bruce and Sharon Robertson (40 Bennett Road, RD 22, Geraldine 7992)						
This further submission is in relation to the original submission of: <i>Enter the name of the original submitter as per the SoDR. E.g. Timaru District Council</i>	This further submission is in relation to the original submission Number: <i>enter the unique submission number as per the SoDR. E.g. 42.45</i>	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is: <i>Support or oppose</i>	The reasons for my/our support/ opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Oliver Amies	22.2	SUB - Subdivision - Standards - SUB/S1 Allotment Sizes and Dimensions	Support	We agree with Mr Amies' submission for smaller allotment sizes in RLZ to enable more cost effective development and sustainable use of the limited RLZ land resource. Council should apply a site specific approach to lot size to promote innovative and appropriate 'best practice' solutions.	Allow submission in full	Amend SUB-S1.4 to allow for 2000 sqm in the FDA10 Overlay for RLZ and apply this logic to other RLZ areas to fulfil demand for desirable larger size sections across the District. Promote Objectives, Policies and Rules that make available and enable sustainable use of limited RLZ land resources across the district.  Remove FDA 11 overlay and rezone the relevant area as RLZ (as a minimum) to reflect its current use for reasons that are clearly stated in the Joint Parties Submission which we are included in (Submission Number 108) and other relevant Submissions including No's 26 (Kellahan), 32 (Selbie), 85 (Badcock), 88 (Morten), 109 (Harper), 138 (Houwaard-Sullivan) and 160 (Payne).
R & G Kellahan	26.1	Planning Maps - Rezone	Support	We support this submission in full. It does not make sense to maintain the GRUZ across the precinct to the north of Geraldine (encompassed by Main North Road, Bennett Road and Templer Street). Doing so is at odds with Section 2 of the RMA and various other strategic planning objectives and the site area is in perfect proximity to Geraldine and is already well serviced. Its existing use is already predominantly RLZ, with parts also in residential and commercial use. It is clearly part of the peri-urban area of Geraldine township.	Allow submission in full.	Apply the relief sought in original submission. Zone the land bounded by Main North Road, Templer Street and Bennett Road (proposed FDA 11) as RLZ (at a minimum). Immediate rezoning as RLZ would best reflect the current level of development and activities of the area.  Environment Canterbury provides Templer Street and Bennett Road as the clear boundary of the Geraldine Clean Air Zone, which further recognises the area's proximity to Geraldine's residential area within the peri-urban zone (refer page: 12-31 Canterbury Air Regional Plan - Te mahere ā-rohe mō te hau o Waitaha 2017 and associated e-map <a href="https://mapviewer.canterburymaps.govt.nz/?webmap=ea9ae61f9e8f4d70a977d869b2c2e527">https://mapviewer.canterburymaps.govt.nz/?webmap=ea9ae61f9e8f4d70a977d869b2c2e527</a> ). In our view, this provides further confirmation, if any is needed, that TDC's intention to zone this area GRUZ is inappropriate and illogical. It is clearly a mix of residential, commercial and rural lifestyle uses and the existing and proposed zoning is completely out-of-step with the reality of existing use.
Bruce Selbie	32.1	Planning Maps - Rezone	Support	We support the submission based on the matters outlined in the summary, and agree particularly that the PDP does not provide enough residential and RLZ land to support Geraldine's current and future needs.	Allow submission in full.	We support rezoning 77 Main North Road as RLZ, but consider that the entire area encompassing Main North Road, Bennett Road and Templer Street should all be rezoned as RLZ (as a minimum), to reflect the current level of subdivision and the existing characteristics and activities of the area (as per submission 26 (Kellahan); 85 (Badcock); 88 (Morten); 108 (Joint Submission); 109 (Harper); 160 (Payne)). This area provides a defensible boundary between Geraldine township and general rural uses, and it is illogical to maintain this precinct as GRUZ zoning. As per Submission 26: "Zoning this area as GRUZ does not give effect to multiple over-riding directives including but not limited to the NPS on Urban Development Capacity 2016, Objectives OA1-3, Timaru Growth Management Strategy, Strategic Directions 1, 3, 7 and 8, and Part 2 of the RMA, Section 7(b) and (ba). Applying FDA 11 is also illogical, when the current use of the precinct is primarily RLZ."

Milward Finlay Lobb	60	Subdivision - SUB S1	Support	The 2 ha RLZ minimum allotment size where there is no sewer connection is overly restrictive and is not inline with other Council precincts (i.e. no minimum allotment size for Settlement Zones, Paereora and Woodbury, where there is no sewer access). The prescriptive minimum allotment size undermines Council's discretion, will likely lead to perverse outcomes and prevent innovative development solutions.	Allow submission in full	Amend 4.4. to: in any other areas, 5000m2 to provide flexibility and Council discretion for providing the best development solutions for specific sites. This will avoid wasteful use of limited RLZ land and perverse outcomes with restrictive consenting rules. Council will always have the AEE mechanism to mitigate adverse effects as per the RMA. Furthermore, as per Submission 22 (Amies) this logic can be argued for 2000m2 lot sizes, because On-site Wastewater Management Systems (OWMS) can be designed effectively for this lot area depending on factors like, but not limited to, soil type and carrying capacity. This would further avoid wasteful use of RLZ resources.
	60	FDA - R7	Support	A non-complying activity status for more than one residential unit per site is far too restrictive and diminishes Council's discretion. This is very short sighted given that our district, and Aotearoa is currently confronting a housing shortage.	Allow submission in full.	Accept relief proposed in original submission, OR wording to similar effect.
John Leonard Shirtcliff and Rosemary Jean Shirtcliff	81.2, 81.3	SUB - Subdivision - Standards - SUB S1 - Allotment sizes and dimensions	Support	2ha minimum lot size is too large as a minimum size for RLZ, it will lead to wasting the RLZ resource and poor management outcomes. In a rural town like Geraldine there needs to be a happy medium achieved with providing land options that provide manageable lot size but provide more rural amenity than dense town subdivisions. Rural amenity and some space is what attracts people to live in towns like Geraldine, but 2ha requires a huge amount of work to maintain, while being too small to be self sustaining. The 2 ha RLZ minimum allotment size where there is no sewer connection is overly restrictive and is not inline with other Council rules. The prescriptive minimum allotment size limits Council's discretion and will likely lead to perverse outcomes and prevent innovative development solutions.	Allow submission in full.	Remove the 2ha minimum lot size. It is too large as a minimum size for RLZ and wasteful of the limited RLZ resource. Canterbury Regional Council (hereafter ECan) has clear objectives, policies and rules relating to OWMS, drinking water separation zones and allotment sizes where sewer connection is unavailable (see submissions 108 and 160). These rules should take precedence with District Council planning mechanisms being in alignment to avoid overreach. The addition of further and contradictory rules is unnecessary, causes confusion, delays and adds unnecessary cost.
John and Linda Badcock	85.1	Planning Maps - Rezone	Support	We support the submitter's view that more RLZ and Residential land for housing development is required to support / provide for Geraldine's growth and prosperity. The lack of suitable land currently available is currently holding back the community. Not enough land has been zoned for RLZ close to Geraldine township. The minimum allotment size of 2 ha for RLZ is too large for many people to manage. The area to the north of Geraldine particularly within the Main North Road, Templer Street and Bennett Road precinct is appropriate for residential and rural lifestyle development and due to having most services immediately available could provide some opportunities for development within a relatively short timeframe to meet the apparent need.	Allow submission in full	Support relief sought in original submission, as follows: "Make more residential and rural lifestyle land available to provide for the current needs of Geraldine and future growth and prosperity. The area to the north of Geraldine along the east and the rest of Main North Road from Templer Street to Bennett Road and Woodbury Road should be rezoned an appropriate mix of residential and rural lifestyle with smaller, more manageable lots consented. This area should not be retained as GRUZ."
Anna Morten	88.1	Planning Maps - General	Support	Not enough land has been zoned for RLZ close to Geraldine township which has detrimental effects on the prosperity of the town.	Allow submission in full.	Support relief sought in original submission. Rezone the area to the north of Geraldine, along the Main North Road to Woodbury Road and east of Main North Road between Templer Street and Bennett Road to RLZ (as a minimum) to reflect the existing land use of the area and provide additional housing opportunities for our community.

G & R Harper, R & G Kellahan, B & S Robertson, D & S Payne	108.1	Planning Maps - Rezone	Support	It is not appropriate to zone the relevant area as GRUZ. The existing land use activities are not consistent with the Timaru District Council's Proposed GRUZ Objectives, Policies and Rules. The proposed zoning does not meet Part 2 of the RMA. If the land is rezoned RLZ now, Templer Street and Bennett Road become a clear delineated defensible edge of the GRUZ and this more appropriately reflects the existing use of the area on the peri-urban zone, while enabling council to provide for current and future land demand in Geraldine. Submission 26 (R & G Kellahan) and submission 160 (D & S Payne) specifically address the inappropriateness of current and proposed zoning.	Allow submission in full.	Accept relief sought in original joint party submission: The relevant area of land should be rezoned from GRUZ to RLZ to reflect the existing land use of the area and provide scope and flexibility for the future. The area has <b>NOT</b> aligned with the proposed GRUZ Policies, Objectives and Rules for many years. The area is also located in perfect proximity to Geraldine township, on flat gradient flood safe land, with easy walking/biking access to the urban centre without needing to use a car, which is increasingly important to people and a focus of 'active and accessible urbanism'. In addition, Environment Canterbury defines Templer Street and Bennett Road as the clear boundary of the Geraldine Clean Air Zone, which further recognises the area's proximity to Geraldine's residential area within the peri-urban zone. (refer page: 12-31 Canterbury Air Regional Plan - Te mahere ā-rohe mō te hau o Waitaha 2017 and associated e-map <a href="https://mapviewer.canterburymaps.govt.nz/?webmap=ea9ae61f9e8f4d70a977d869b2c2e527">https://mapviewer.canterburymaps.govt.nz/?webmap=ea9ae61f9e8f4d70a977d869b2c2e527</a> ). In our view, this provides further confirmation, if any is needed, that TDC's intention to zone this area GRUZ is inappropriate and illogical. It is clearly a mix of residential, commercial and rural lifestyle uses and the existing and proposed zoning is completely out-of-step with the reality of existing use.
	108.2	Planning Maps - Future Development Area Overlay - FDA11 - Templer Street Future Development Area	Support	We support removing FDA11 from the Future Development Area Overlay. Given the length of time for Council processes and plan review, the 10+ year timeframe creates significant uncertainty for those living in the relevant area and has no benefit given the realities of its current use. Council has to accept that the relevant area is no longer GRUZ and immediately zone the entire area RLZ (as a minimum) recognising the form and function of the predominant land use it currently has and its immediate proximity to Geraldine's urban area.	Allow submission in full.	Delete FDA11 from the Future development Area overlay. Rezone relevant area to RLZ (as a minimum) to recognise its current use and immediate proximity to Geraldine's urban area.
	108.3	SUB - Subdivision - General	Support	We support the original submission content. 2ha minimum lot size is too large as a minimum size for RLZ, it will lead to wasting the RLZ resource and poor management outcomes. In a rural town like Geraldine there needs to be a happy medium achieved with providing land options that provide manageable lot size but provide more rural amenity than dense town subdivisions. Rural amenity and some space is what attracts people to live in towns like Geraldine, but 2ha requires a huge amount of work to maintain, while being too small to be self sustaining. The 2 ha RLZ minimum allotment size where there is no sewer connection is overly restrictive and is not inline with other Council rules. The prescriptive minimum allotment size limits Council's discretion and will likely lead to perverse outcomes and prevent innovative development solutions. We emphasise that ECan is the consenting authority for OWMS. We note that "for areas larger than 4ha On-site Wastewater Disposal is a <b>Permitted Activity</b> . All applications are assessed on a case-by-case basis, but, in general detailed information and proof of plans for highly-effective systems will be required for: sites <b>smaller than 4 ha</b> ; ...".	Allow submission in full.	Remove the 2ha minimum lot size. It is too large as a minimum size for RLZ and wasteful of the limited RLZ resource. Accept relief in original submission. Amend the SUB-Subdivision chapter to: 1. Remove the 2ha minimum lot size for OWMS within the RLZ. 2. Create rules to align with SUB-P15, and ensure consistency with Environment Canterbury's activity rules related to OWMS. SUB-P15 may need to be aligned to reflect Mr Amies submission (no. 26), bearing in mind that OWMS can be designed to be effective at 2000m <sup>2</sup> in particular situations.

George and Rachel Harper	109.1	Planning Maps - Rezone	Support	We support this submission in full. We agree that the TDC's current approach to land availability in Geraldine is far too conservative. Not enough land has been zoned for housing close to Geraldine, which is impacting on the community's current social and economic prosperity and ability to retain talent, which will intensify going forward. Continuing to zone the area as Rural (GRUZ) does not meet the purpose and principles of Part 2 of the RMA nor TDC's own Objectives, Policies and Rules that are in the documentation for the Proposed (Notified) District Plan including The Growth Management Plan (2016) and the s. 32 Subdivision report.	Allow submission in full.	Council needs to take a strategic view of the area north of Geraldine and zone it appropriately (RLZ as a minimum) to reflect its current use and characteristics. The area has <b>NOT</b> aligned with the proposed GRUZ Objectives, Policies and Rules for many years. The area is also located in perfect proximity to Geraldine township, on flat gradient flood safe land, with easy walking/biking access to the urban centre without needing to use a car, which is increasingly important to people and a focus of 'active and accessible urbanism'.
Yanna Houwaard & Steve Sullivan	138.1	Planning Maps - Rezone	Support	Support submission in full as outlined in the summary. More General Residential (GRZ) and Rural Lifestyle Zone (RLZ) land close to Geraldine township is required to promote the community's prosperity. We agree with the submitters that the area to the north of Geraldine including that within the Main North Road, Templer Street and Bennett Road precinct has been overlooked. The area described above, as recognised by these submitters, is within easy walking and biking distance of the township which is highly desirable for those seeking an active lifestyle and also those wishing to make their contribution to reducing climate change impacts.	Allow submission in full	Accept relief proposal in full. Rezone the the area to the north of Geraldine which covers Main North Road, Templer Street and Bennett Road as RLZ (as a minimum).
David and Susanne Payne	160.1	Planning Maps - Rezone	Support	Support submission, which is also supported by other submitters on the PDP, including no. 26 (Kellahan); no. 85 (Badcock); no. 88 (Morten); no. 108 (Joint Parties Submission, Harper, G et al.); no. 109 (Harper).	Allow submission in full	Accept relief sought in original submission OR wording to same effect.
	160.2	Planning Maps - Future Development Area Overlay - FDA11 - Templer Street Future Development Area	Support	We support this submission. The relevant area should be rezoned immediately as RLZ (as a minimum) to reflect the current use character and activities occurring here. The area is highly fragmented and is already RLZ in general character. It is serviced, with the exception at this stage of wastewater, for which there are clear rules to mitigate impacts and is in close proximity to Geraldine's urban area. The area represents a contained precinct that if rezoned as RLZ would provide greater definition between rural and urban activities in accordance with Strategic Direction 9. There is no reasonable basis for zoning this area GRUZ and preventing the existing infrastructure investments being used to enable development in accordance with the Growth Management Strategy outlined in the s32 Subdivision Report Strategic Direction 10. The proposed 10+ year timeframe as a future development direction is an unnecessary delay given that the area already totally deviates from GRUZ rules, and Geraldine rapidly needs more land to support businesses and community prosperity. Given the length of time for Council processes and plan review, the 10 + year timeframe creates significant uncertainty for no benefit in this specific area.	Allow submission in full.	Delete FDA 11 from FDA Overlay and rezone the relevant area RLZ (as a minimum).

	160.3	SUB - Subdivision - General	Support	We support the original submission's content. We emphasise that ECan is the consenting authority for OWMS. We note that "for areas larger than 4ha OWMS is a <b>Permitted Activity</b> . All applications are assessed on a case-by-case basis, but, in general detailed information and proof of plans for highly-effective systems will be required for: <b>sites smaller than 4 ha</b> ; properties with no reticulated sewers or water, or where groundwater is shallow; areas with known high levels of nitrate and E.Coli in the groundwater; where groundwater is shallow and there are properties with drinking-water bores located near or down gradient from the proposed site; and properties within a Community Drinking-water Supply Protection Zone." The prescriptive application of a 2ha minimum lot size undermines Council's discretion at consenting and will lead to perverse development outcomes.	Allow submission in full.	Accept relief in original submission. Amend the SUB-Subdivision chapter to: 1. Remove the 2ha minimum lot size for OWMS within the RLZ. 2. Create rules to align with SUB-P15, and ensure consistency with ECan's activity rules related to OWMS. Furthermore, as per Submission 22 (Amies) there is an argument for 2000m2 lot sizes, because OWMS can be designed effectively for this lot size depending of factors like, but not limited to, soil type and carrying capacity. This would avoid wasteful use of RLZ resources. Submission 60 (Milward Finlay Lobb) also reflects inconsistencies across the planning documents.
Federated Farmers	182.143	SUB - Subdivision - General	Support	We agree that rural communities like Geraldine need to grow in a well managed way to provide for diversity and vibrancy, the sustainability of essential infrastructure, and the provision of employment flexibility and opportunities.	Allow Submission in full	Accept relief sought in original submission, OR wording to similar effect.
	182.157	SUB - Subdivision - Policies	Support	Generally support this policy (SUB-P15 Rural Lifestyle Zone)	Allow submission in part.	SUB-P15 may need to be aligned to reflect Mr Amies submission (no. 26), bearing in mind that OWMS can be designed to be effective at 2000m2 in specific situations.
Canterbury Regional Council (Environment Canterbury)	183.21	UFD - Urban Form and Development	Oppose	While we support efforts maximise limited RLZ resources, the policy proposed by ECan (of 12 households per ha for RLZ) is too prescriptive and inflexible. This density may be acceptable on the fringes of major urban centres but may not be suitable on the boundaries of small rural townships such as Geraldine. This policy will restrict Council's discretion and lead to perverse outcomes, preventing the ability to achieve innovative land development solutions for Geraldine and across the district. It would also likely prevent the more "bespoke" developments by land owners and result in developments only being progressed by well-resourced development companies who would likely focus on the larger urban area of Timaru city.	Disallow submission point in full	A more nuanced / locally relevant set of rules is required in terms of housing density / development yield, that recognises the need to innovate and work with specific site characteristics and land owners.
	183.103	SUB - Subdivision - Policies - SUB P15 - Rural Lifestyle Zone	Support	ECan has given no indication of what they consider "a larger minimum allotment size" to be with regard to OWMS. At present the prescriptive application of a 2ha minimum allotment size within the TDC's PDP rules for RLZ is at odds with ECan's clear rules related to OWMS systems provided within the Canterbury Land and Water Management Plan. These rules reserve appropriate discretion for ECan as the consenting authority for discharges to land and water and provide flexibility for achieving appropriate site-specific waste-water solutions. This issue is covered in detail within various submissions including, but not limited to, Submissions 60 (Milward Finlay Lobb), 22 (Amies), 81 (Shirtliff) and 160 (Payne).	Allow submission in part.	Retain SUB-P15 as notified, but ensure consistency with current ECan rules pertaining to OWMS. Remove the prescribed 2ha minimum allotment size from RLZ rules to enable discretion in consenting to meet high standards with design solutions via the Assessment of Environment Effects, and recognise different carrying capacities across particular sites and land types throughout the Canterbury Region. As per Submission 22 (Amies) there is an argument for 2000m2 lot sizes, because OWMS can be designed effectively for this lot size depending of factors like, but not limited to, soil type and carrying capacity. This would further avoid wasteful use of RLZ resources in specific locations. The RLZ lot size should relate to anticipated amenity from the zone; it should not be dictated by onsite wastewater management when ECan manage this and have specific rules to do so.

	183.166	Future Development Areas Overlay	Oppose	<p>This submission point is very unspecific about what Ecan considers to be short, medium and long term land release. It is imperative that TDC is proactive with identifying and providing strategic land release within clear timeframes in order to meet the pressing needs of housing supply and ensure growth within the district. From a local perspective, we strongly disagree with a supposed oversupply identified by ECan, as we see no evidence of this. We argue that FDA11 should be immediately rezoned appropriately as it may allow some freeing of land to meet current demand in Geraldine and prevent potential residents from bypassing our community.</p>	Disallow submission in full.	Where FDA mechanisms are considered appropriate for staged land release, clarity should be provided to ensure security and confidence of landholder investment.