



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:

John and Linda Badcock

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

N/A

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:

As business owners and residents of Geraldine we wish to see our community prosper.

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: John and Linda Badcock

Date: 03/08/2023

(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: johnbadcockartist@gmail.com

Telephone: 0274516784

Postal address (*or alternative method of service under section 352 of the Act*): 246 Greenvale Road,
R.D. 21, Geraldine

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

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

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

Additional template for multiple further submission points

Name of person making further submission: John & Linda Badcock (Original Submission No. 85)						
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 more 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 Policies, Objectives 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 an appropriate mix of RLZ and residential to reflect its current use (as per our submission).
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.	Allow submission in full.	Apply the relief sought in original submission. Zone the land bounded by Templer Street, Main North Road and Bennett Road (proposed FDA 11) as RLZ (as a minimum). Rezoning as an appropriate mixture of RLZ and residential would best reflect the current level of subdivision and current characteristics and activities of the area.
Bruce Selbie	32.1	Planning Maps - Rezone	Support	We support the submission based on the matters outlined in the summary, 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 (as a minimum), but consider that the entire area encompassing Main North Road, Bennett Road and Templer Street should all be rezoned as RLZ, to reflect the current level of subdivision and the existing characteristics and activities of the area (as per submission 26 (Kellahan); 88 (Morten); 108 (Joint Submission); 109 (Harper); 138 (Houwaard-Sullivan); 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 of 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 crisis.	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 - Alotment sizes and dimesions	Support	The 2 ha RLZ minimum allotment size where there is no sewer connection is overly restrictive and is not inline with other Council rules (i.e. no minimum allotment size for Settlement Zones, Paereora and Woodbury, where there is no sewer access). The prescriptive minimum allotment size appears to be arbitrary and limits Council's discretion. This will likely lead to perverse outcomes and prevent innovative development solutions. There are contradictions between the PDP and Canterbury Land and Water Regional Plan and Regional Policy Statement that need to be addressed to provide consistency across Regional and District wide matters.	Allow submission in full.	Canterbury Regional Council (hereafter ECan) has clear policies, objectives 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.

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.
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 (as a minimum) to reflect the existing land use of the area and provide scope and flexibility for the future.
	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 recognising the form and function of the predominant landuse it currently has.	Allow submission in full.	Delete FDA11 from the Future development Area overlay. Rezone relevant area to RLZ (as a minimum).
	108.3	SUB - Subdivision - General	Support	We support the original submission content. We emphasise that ECan is the consenting authority for OWMS. We note that "for areas larger than 4ha On-site Wastewater Disposal is a Permitted Activity . 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 smaller than 4 ha ; 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 of 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 limits 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 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 2000m2 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 (we suggest a mix of RLZ and Residential) to reflect its current use and characteristics, which is NOT GRUZ and hasn't been for many years.
Steve and Yanna Houwaard Sullivan	138.1	Planning Maps - Rezone	Support	Support submission in full. More General Residential Zone (GRZ) and Rural Lifestyle Zone (RLZ) land close to Geraldine township is required to promote the community's future prosperity.	Allow submission in full.	Accept relief sought in original submission OR wording to same effect.
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 (R&G Kellahan); no. 88 (Anna Morten); no. 108 (Joint Parties Submission, Harper, G et al.); no. 109 (G & R Harper); no. 138 (Steve and Yanna Houwaard Sullivan).	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 to reflect the current use character and activities occurring here. The area is highly fragmented, is already RLZ in character, and is serviced 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.
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 to maximise limited RLZ resources, the policy proposed by ECan (of 12 households per ha for RLZ) is too prescriptive and inflexible. 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.	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.

From: [Linda Badcock](#)
To: [PDP](#)
Subject: TDC proposal ATTN Alanna
Date: Friday, 25 August 2023 12:47:12 pm

Dear Alanna

Thank you for your email, we appreciate you following up with us to clarify.

Having re-read the Statutory 6 form and considering what you have said in your email to us, it would be best if the form could be amended as we believe we are not "a person who has an interest that is greater than the interest the general public has". We are local residents of Geraldine who wish to see our community prosper and have suggested some areas where Timaru District Council should consider rezoning to allow growth to happen, but we are **not** landowners in the suggested areas. Therefore, we would consider that we are "a person representing a relevant aspect of the public interest".

We hope that this clarification satisfies what you require of us and the amendment can be made. As lay people, some of the details can be a bit confusing in this process.

Kind regards,

John & Linda Badcock
Artist
0274516784