

20 February 2025

Aaron Hakkaart
Planning Manager – District Plan Review
Timaru District Council
PO Box 522
TIMARU 7940

By email: aaron.hakkaart@timdc.govt.nz
cc: pdp@timdc.govt.nz

Dear Aaron

**Proposed Timaru District Plan: Hearing G (Growth) - Pages Trust and Russell Trust
(Submission No. 203)**

1. As you are aware, we act for the Pages Trust and Russell Trust (**Submitters**), which made a joint submission on the Proposed Timaru District Plan (**PDP**) in relation to the proposed FDA2 - Kelland Heights East Future Development Area – Residential Development (**FDA2**) (Submission No. 203) (**Submission**).
2. The purpose of this letter is to:
 - (a) Clarify the decisions sought in the Submission; and
 - (b) Respond to the Panel's directions contained in Minute 13 (dated 5 August 2024) for submitters to provide the information set out in the preliminary section 42A report for Hearing G (Growth) (**Preliminary s42A Report**) by 20 February 2025;¹

in light of the matters set out in the Memorandum of Counsel on behalf of Timaru District Council (**Council**) dated 22 January 2025 and the accompanying memorandum prepared by Matt Bonis of Planz Consultants dated 21 January 2025 (**Planz Memorandum**).

Decisions sought in the Submission

3. To provide context to the response to the Preliminary s42A Report set out in this letter, it is appropriate to clarify the decisions sought in the Submission.
4. In summary, the Submission seeks:
 - (a) Those parts of 251, 273, 279 and 295 Pages Road that are identified in the report prepared by Davis Ogilvie for Council² as being able to be serviced from either the

¹ Minute 13, at [5].

² Davis Ogilvie Memorandum Report, dated 4 October 2022 (**DO Report**), which is attached as **Annexure B**.

existing Council wastewater main on Pages Road³ or an extension of that main⁴ be zoned “General Residential”,⁵ as shown below:

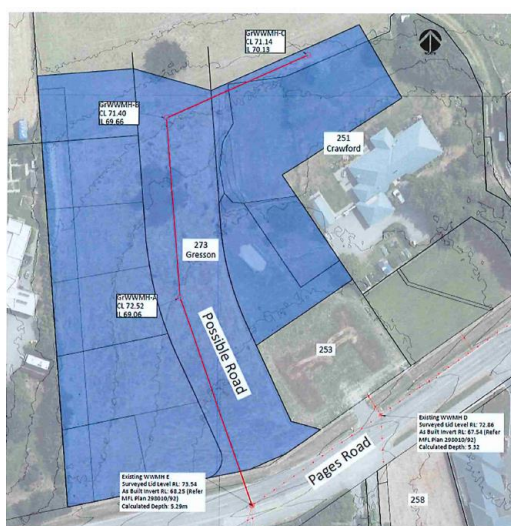


Figure 3: 251 & 273 Serviceable Area for Wastewater.

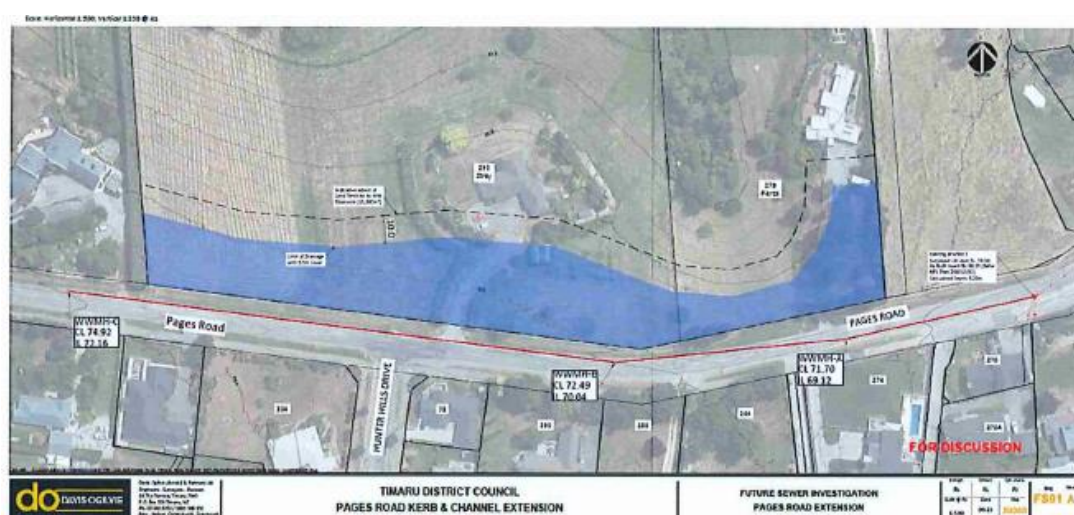


Figure 4: Pages Road Wastewater Extension

- (b) The sequencing of development of the remaining land subject to the proposed FDA2 Overlay as set out in Schedule 15 of the PDP be amended so that the land can be developed within 2 years instead of the proposed 5 year timeframe.⁶
- (c) The requirement for the development area plan (**DPA**) for FDA2 to be developed in conjunction with Kellands Heights West be deleted.⁷
- (d) Consequential amendments to the PDP.⁸

³ DO Report, Figure 3, page 4.

⁴ DO Report, Figure 4, page 5.

⁵ Submission, at [14](a).

⁶ Submission, at [14](b).

⁷ Submission, at [14](c).

⁸ Submission, at [14](d).

5. In support of those decisions, the Submission referred to the following recommendation of Planz Consultants in their report entitled Timaru District Growth Management Strategy Review dated April 2022 (**GMS Review**):⁹

Amend the zoning of the western end of the Pages Road/Kellands Hill Road site (shown as DEV5 and zoned RLZ in the Draft District Plan) from GRUZ to GRZ. This land is not as intensively developed with rural lifestyle properties as the western end of DEV5 and is a logical next step for extending Timaru and is again close [to] facilities including, Aorangi Park, Mountain View High School and primary schools. It is assumed that approximately 6 ha of this area will not be developed due to existing rural lifestyle development and waterways, accordingly the area available equates to approximately 29 ha. At 12 HH/ha, the site could yield up to 348 HH over the life of the Plan. The area to be rezoned is shown in **Figure 2** below.

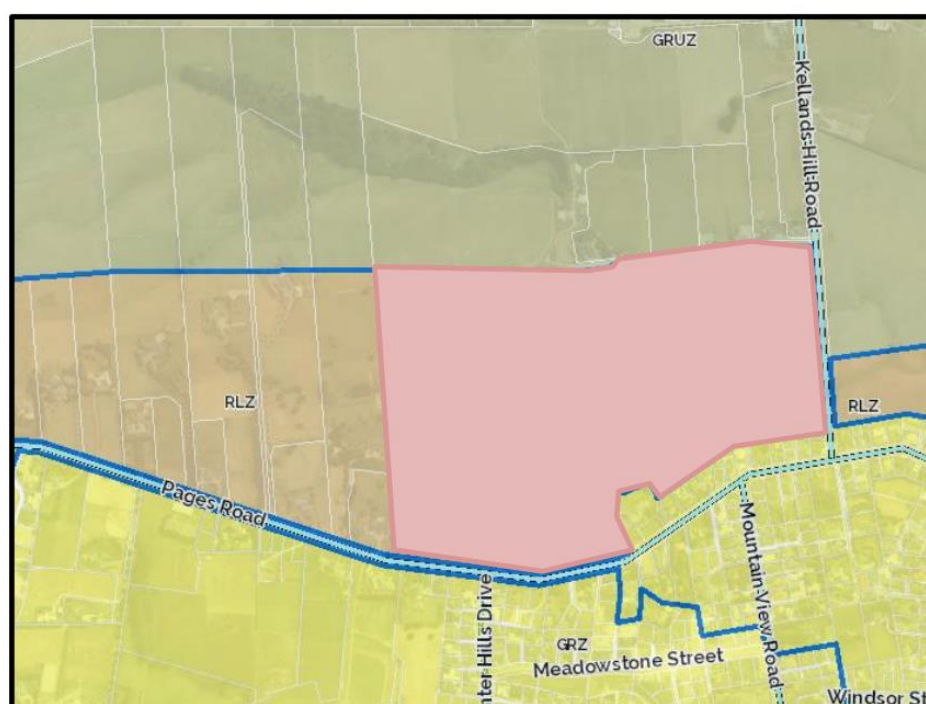


Figure 2: Amend zoning of shaded area to GRZ

6. In effect, the decisions sought in the Submission bring forward the intended General Residential Zoning of FDA2, recognising that:
- (a) The development of that part of FDA2 referred to in [4(a)] above can be serviced now from existing infrastructure; and
 - (b) The development of the remainder of FDA2 within two years of the Panel's decision on submissions on the PDP (expected by the end of March 2026) will be three and a half years after the PDP was publicly notified,¹⁰ which is within the timeframe that the PDP envisaged a Council-initiated plan change process to rezone FDA2 to General Residential would have commenced.

⁹ Planz Report, at page 22, clause (b).

¹⁰ On 22 September 2022.

Information requested in Preliminary s42A Report

Errors in Preliminary s42A Report

7. For completeness, we note that the Preliminary s42A Report incorrectly refers to “Hamilton” as the name of the submitter and instead should refer to “Pages Trust and Russell Trust”.
8. We also note that the Preliminary s42A Report incorrectly identifies the Submission as in part being in the category of submissions that seek to “Rezone from General Rural Zone to Rural Lifestyle Zone / revised SCHED 15 timing”¹¹ and in part in the category of submissions that seek to “Extend FDA Overlay for General Residential Zone or Rural Lifestyle Zone”.¹² In our view, the decisions sought in the Submission are not in either of those submission categories. Instead, we consider the Submission should be grouped with submissions that seek to “Rezone from GRUZ to General Residential Zone / revise SCHED 15 timing”.¹³ This is on the basis that the land that the Submission relates to:
 - (a) Is zoned General Rural under the PDP;
 - (b) Lies entirely within FDA2;
 - (c) Seeks:
 - (i) To rezone part of that land to General Residential; and
 - (ii) For the remaining land comprising FDA2, to change the development sequencing from 5 to 2 years.

Further information required

9. Notwithstanding those errors, we have distilled from the Preliminary s42A Report that the following information is required to be provided in relation to the decisions sought in the Submission:
 - (a) The “General Information” listed in Attachment C to the Preliminary s42A Report;
 - (b) “Focused consideration” of the following:
 - (i) The existing environment, including configuration and fragmentation of the titles and geophysical boundaries that would delineate the requested zone boundaries;
 - (ii) The exact spatial extent of the rezoning sought and anticipated yield;
 - (iii) Application of the requirements of the National Policy Statement for Highly Productive Land (**NPS-HPL**);
 - (iv) Application of the requirements in the National Policy Statement for Urban Development in terms of development capacity beyond ‘at least sufficient development capacity’ for the purpose of Policy 2, and implications for integrated infrastructure and funding decisions (Objective 6);

¹¹ Preliminary s42A Report, at 11.3, page 38 (Submission No. 203.2).

¹² Preliminary s42A Report, at 11.5, page 40 (Submission No. 203.1).

¹³ Preliminary s42A Report, at 11.4, page 39.

- (v) Consideration against the relevant statutory framework for achieving a consolidated pattern of development (as required by the Canterbury Regional Policy Statement and notified PDP), which includes the provision of a ‘co-ordinated pattern of development’¹⁴ including implications for amending timeframes associated with SCHED-15; and
- (vi) Service provision as set out in **Attachment B**.

10. Subject to the comments we make below in relation to the Planz Memorandum and the NPS-HPL, a response to each of the above items in relation to the decisions sought in the Submission is provided in **Annexure A** to this letter.

Planz Memorandum

11. The Planz Memorandum suggests the land that is the subject of the Submission is not “highly productive land” for the purposes of clause 3.5(7) of the NPS-HPL and the NPS-HPL is therefore not applicable to the Submission.¹⁵ That position appears to be on the basis that (summarily):
- (a) In terms of the decision regarding rezoning of parts of FDA2 to General Residential sought in the Submission, whilst the land is zoned General Rural under the PDP¹⁶ and comprises Land Use Classification 3¹⁷, it is identified in a strategic planning document (i.e., the GMS Review) as ‘an area suitable for commencing urban development over the next 10 years.’¹⁸
 - (b) In terms of the decision regarding the remainder of FDA2 (i.e., to change the timing of the DAP in SCHED 15) sought in the Submission, FDAs are not “highly productive land” for the purposes of the NPS-HPL as they do not re-zone land.¹⁹
12. This position is supported by the Submitters. Accordingly, the responses provided in Annexure A do not include an analysis of the decisions sought in the Submission against the NPS-HPL.

Concluding comments

13. As set out in the responses to the questions posed in the Preliminary s42A Report in Annexure A of this letter, the Submitters consider that the information already before Council supports the decisions sought in the Submission, namely:
- (a) Council’s section 32 report for Future Development Areas (dated May 2022);
 - (b) The recommendations in the GMS Review in relation to the land that is subject to the proposed FDA2 overlay in the PDP;
 - (c) The DO Report; and

¹⁴ CRPS, Policy 5.3.1(1)(a).

¹⁵ Planz Memorandum, page 16.

¹⁶ Clause 3.5(7)(a)(i).

¹⁷ Clause 3.5(7)(a)(ii).

¹⁸ Clause 3.5(7)(b)(i). Planz Memorandum, at [12].

¹⁹ Planz Memo, at [14], [22] to [24].

- (d) Planz Consultant's letter of 18 February 2025 providing an update on Council's "Elloughton South, Elloughton North and Kellands Heights East Development Area Project" (**attached as Annexure C**).
14. Please advise if Council considers further information is required to inform its recommendations in relation to the Submission, and if so, details of what further information is required.
15. If it is of assistance, representatives of the Submitters would welcome the opportunity to further discuss the Submission with yourself, the s42A reporting officer and/or other Council-officers as considered appropriate.

Yours faithfully

GRESSON DORMAN & CO



Georgina Hamilton
Partner

Email: georgina@gressons.co.nz

ANNEXURE A: RESPONSE TO INFORMATION REQUEST

Information requested		Response	
		Submission No. 203.1 ²⁰	Submission No. 203.2 ²¹
General Information²²			
1.	What is the contribution of the rezoning (or amendment in timing associated with SCHE-15 (FDAs)) in terms of the provision (residential/rural lifestyle – yield, density; and business – area) in relation to the Council’s provision of ‘at least’ sufficient development capacity (Policy 2 [of the National Policy Statement on Urban Development (NPS-UD)]) given the Property Economics analysis (Section 8)? [Question 1]	<p>The Property Economics analysis²³ referred to in the Preliminary Section 42A Report proceeds on the basis that the population of the Timaru District will be between 49,300 and 57,500 by 2025, equating to increases of 1,603 households under a “medium projection scenario” and 4,330 households under a “high projection scenario”.²⁴</p> <p>However, publicly available information indicates the population of the Timaru District in 2024 had already reached 50,100.²⁵ The Property Economics analysis is also out of step with analysis commissioned by Venture Timaru from Benji Patterson of People & Places,²⁶ which indicates that Timaru District could require up to 9,000 more households by 2050.²⁷</p> <p>The Submitter considers the conclusions drawn in the Property Economics analysis in relation to development capacity need to be treated with caution, and at best, are conservative.</p> <p>The land that the Submitters seek to be rezoned from General Rural to General Residential are within the area comprising FDA2 under the PDP, which the GMS Review recommends be zoned General Residential as a “live zone” (i.e. moving the land straight to a General Residential Zone rather than a deferred zone, as proposed in the PDP). That Report indicates that the land comprising FDA2 would accommodate 348 households over the life of the PDP.²⁸ This will contribute to achieving the Timaru District’s anticipated capacity needs for the life of the PDP identified in both the Property Economics and People & Places Reports.</p>	

²⁰ Rezone parts of FDA2 to General Residential Zone.

²¹ Change in sequencing of FDA2 in SCHED 15 from 5 years to 2 years.

²² Preliminary s42A Report, Attachment C.

²³ “Timaru District Residential Capacity Economic Assessment”, Property Economics, February 2022 (**Property Economics Report**).

²⁴ Property Economics Report, at page 7.

²⁵ <https://rep.infometrics.co.nz/timaru-district/population/growth>

²⁶ “Scenarios of an aspirational economic future for Timaru District”, Benji Patterson (People & Places), October 2022 (**People & Places Report**).

²⁷ People & Places Report, at page 10.

²⁸ GMS Review, at page 22, clause (b).

Information requested		Response	
		Submission No. 203.1 ²⁰	Submission No. 203.2 ²¹
2.	For residential and business rezonings how would the rezoning (or amendment in timing associated with SCHED-15 (FDAs) contribute to 'well-functioning urban environments' (Objective 1 and Policy 1 [of the NPS-UD]) and align with responsibilities of the Council to ensure decisions on urban development that affect urban environments are integrated with infrastructure planning and funding decisions (Objective 6 [of the NPS-UD])? [Question 2]	<p>The Submitters consider that the decision sought in the Submission are consistent with and will give effect to Objectives 1 and 6, and Policy 1, of the NPS-UD as:</p> <ul style="list-style-type: none"> (a) The objectives and policies of the NPS-UD informed the recommendation made in the GMS Review for the land comprising FDA2 (which is the subject of the Submission) to be entirely zoned General Residential.²⁹ The GMS Review also adopts the position that the NPS-UD expects councils to identify more land than what is required to meet housing demand.³⁰ (b) The DO Report confirms that the residential development of those parts of proposed FDA2 referred to in [4(a) of our letter can be serviced now from existing wastewater infrastructure. (c) Council has already initiated technical work that indicates the land comprising all of proposed FDA2 can be serviced now from existing infrastructure.³¹ (d) The development of the remainder of FDA2 within two years of the Panel's decision on submissions on the PDP (expected by the end of March 2026) will be three and a half years after the PDP was publicly notified.³² This is within the timeframe that the PDP envisaged a Council-initiated plan change process to rezone FDA2 to General Residential would have commenced (and can be assumed to align with Council infrastructure planning and funding decisions). <p>The Submitters also note that in December 2022, Council advised of its intention to deliver its Pages Road upgrade project that would involve new kerb and channel, existing carriageway pavement upgrading, carriageway seal widening, carriageway seal widening (south side) for a parking lane and grass berm re-shaping/reprofiling. The Submitters understood that, at that time, Council was investigating what other services (wastewater, stormwater and water supply) was needed to be installed as part of those works for servicing full residential development of the land comprising proposed FDA2. However, this project is yet to commence.</p>	

²⁹ GMS Review, section 4.1.

³⁰ GMS Review, at page 5.

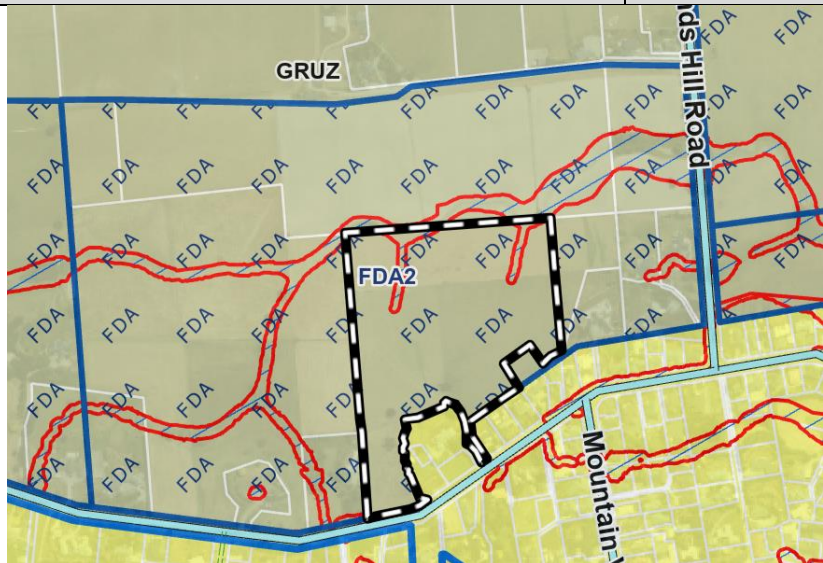
³¹ Letter from Planz Consultants dated 18 February 2025, attached as Annexure C.

³² On 22 September 2022.

Information requested		Response	
		Submission No. 203.1 ²⁰	Submission No. 203.2 ²¹
3.	Growth Rezonings / Amendments to SCHED-15: Does the proposal, either individually or in combination with those areas identified in the PDP concentrate and promote a co-ordinated pattern of development (referencing capacity provided in Section 8 of this report)? [Question 5]	<p>The GMS Review confirms that the land comprising FDA2 is not as intensively developed with rural lifestyle properties as the western end of that land, is a logical next step for extending Timaru and is close to facilities including, Aorangi Park, Mountain View High School and primary schools.³³</p> <p>The Submitters therefore consider that the rezoning and amendment to the sequencing of development of FDA2 sought in the Submission will concentrate and promote a co-ordinated pattern of development. Accordingly, the Submitters consider the decisions sought in the Submission will give effect to Objective 5.2.1, Policy 5.3.1 and Policy 5.3.2 of the Canterbury Regional Policy Statement (CRPS).</p>	
4.	Energy efficiency: Does the proposal assist in maintaining an urban form that shortens trip distances? [Question 6].	<p>The objectives and policies of the CRPS informed the recommendation made in the GMS Review for the land comprising FDA2 (which is the subject of the Submission) to be zoned General Residential.³⁴ The Submitters therefore consider that the decisions sought in the Submission would give effect to Objective 16.2.1.</p>	
5.	Natural Hazards: Is the subject site associated with the subdivision free from inappropriate risk from a natural hazard event, if not, what is the appropriate management response – including avoidance? [Question 7]	<p>The subject sites are subject to the flood assessment area overlay, as shown in the extract of the PDP's e-plan maps below. This flooding risk can be appropriately managed by the PDP's natural hazards provisions and dealt with at the time subdivision consent is sought for development, informed by the technical work Council currently has underway as part of the development of a DAP for proposed FDA2.</p>	

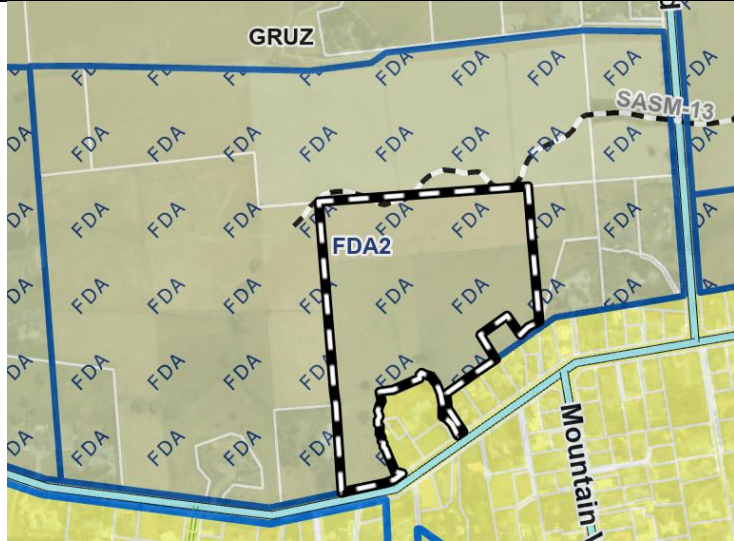
³³ GMS Review, at page 22, clause (b).

³⁴ GMS Review, section 4.3.

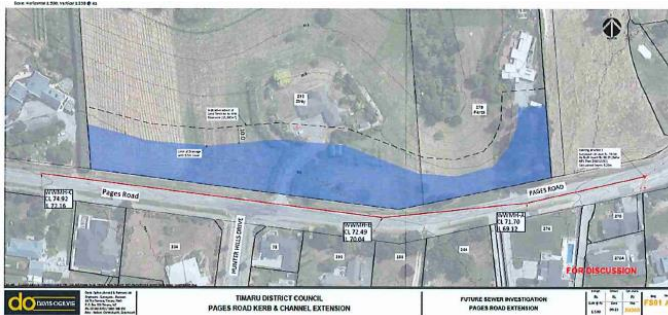
Information requested		Response	
		Submission No. 203.1 ²⁰	Submission No. 203.2 ²¹
			
6.	Proposed District Plan: Does the urban growth ... development (and or sequencing) contribute to a coordinated pattern of development and is capable of integrating with the efficient use of infrastructure? [Question 8]	Refer to the responses provided in (2) and (3) above.	
7.	Growth Rezoning/Amendments to SCHED-15: Given the updated residential capacity projections in Attachment A, how does the proposal, either individually or in combination with those areas identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure	Refer to the response provided in (1) above.	

Information requested		Response	
		Submission No. 203.1 ²⁰	Submission No. 203.2 ²¹
	'sufficient development capacity'? [Question 10]		
8.	Service Provision: Identify (in conjunction with the requirements of Attachment B) how the future servicing needs of the area and the provision of adequate , co-ordinated and integrated infrastructure to serve those needs, including how using water sensitive design to manage stormwater will be undertaken. [Question 11]	Refer to the response provided in (2) above. Stormwater can be appropriately managed by the PDP's stormwater provisions and dealt with at the time subdivision consent is sought for development, informed by the technical work Council currently has underway as part of the development of a DAP for proposed FDA2.	
9.	Infrastructure integration: Identify whether the rezoning if not required for 'sufficient development capacity' would result in wider issues for the district in terms of integration with infrastructure planning and funding decisions...[Question 12]	Not applicable to the Submission. The GMS Review confirms that the rezoning of the area comprising proposed FDA2 to General Residential is required for 'sufficient development capacity'.	
10.	Hazards: demonstrate with reference to suitable standards, the avoidance and/or management of inappropriate natural hazard risk, and suitable geotechnical conditions. [Question 13].	Refer to the response provided in (5) above.	
11.	Transport network integration: Demonstrate with reference to suitable standards and the potential yield/density of development – the safe and efficient functioning of the supporting transport network, ability to facilitate modal choice, and consolidating an accessible urban form. [Question 14]	The recommendations made in the GMS Review in relation to the rezoning of the land comprising FDA2 to General Residential were informed by the directions provided in the objectives and policies of the NPS-UD and CRPS in relation to transport network integration. The Submitters therefore consider that the decisions sought in the Submission are expected to achieve the safe and efficient functioning of the supporting transport network, the ability to facilitate modal choice, and consolidating an accessible urban form.	

Information requested		Response	
		Submission No. 203.1 ²⁰	Submission No. 203.2 ²¹
12.	<p>Existing Environment and characteristics: Identify the following as relevant to the submission:</p> <p>(a) The existing lawfully established land use(s) as they relate to the area that is subject to the submission, including: density (and existing fragmentation of sites), amenity and character, and range of uses.</p> <p>(b) Geophysical boundaries that would distinguish zone boundaries, including how the proposed would result in the contiguity of existing urban areas (proximity and agglomeration of existing urban areas).</p> <p>(c) Existing resource consents that provide for established land uses, including alignment with the anticipated outcomes associated with the submission.</p> <p>[Question 15]</p>	<p>The Submitters understand these matters have been considered and have informed the recommendation contained in the GMS Review that the land which is subject to the proposed FDA2 should be zoned General Residential (i.e., as a “live zone”). Refer also to the response provided in (13) below.</p>	
13.	<p>Environmental values: Where the site incorporated or adjoins any of the following as notated within the PDP:</p>	<p>Site or Area of Significance to Māori No. 13 (Wai Taoka Line: Te Ahi Tarakihi (Taitarakihi) Stream is the only specific value identified in the PDP’s e-maps of the land comprising the proposed FDA2, as shown in the map below:</p>	

Information requested		Response	
		Submission No. 203.1 ²⁰	Submission No. 203.2 ²¹
<p>(a) Specific values associated with Landscape values and natural character;</p> <p>(b) Biodiversity constraints;</p> <p>(c) Cultural and/or Heritage values;</p> <p>(d) Existing or permitted Intensive Farming Activities, Rural Industry or other established Rural [activities] that could generate incompatible land uses with the submission outcome.</p> <p>Submitters shall provide information as to whether any additional standards, rules or methods (other than those already contained within the respective zone standards) are required to maintain or enhance any specific attribute, value or effects. This shall include where specific features or attributes should be retained through subsequent subdivision, use or development. [Question 16]</p>		 <p>The Submitters understand this specific value has been addressed and has informed the outcome of Council's work in relation to proposed FDA2, as outlined in the letter attached as Annexure C.</p> <p>The Submitters expect the recommendations of the GMS Review in relation to the land that comprises proposed FDA2 were informed by considerations of reverse sensitivity effects arising from residential development adjoining the General Rural Zone and existing farming activities. Any risk of reverse sensitivity effects arising from residential development of that land is minimised due to the existing rural-residential development within the adjoining General Rural Zone.</p>	
Focused considerations			
14.	The existing environment, including configuration and fragmentation of the titles and geophysical boundaries that would delineate the requested zone boundaries.	Refer to the responses provided in (12) and (13) above.	

Information requested		Response	
		Submission No. 203.1 ²⁰	Submission No. 203.2 ²¹
<p>15. The exact spatial extent of the rezoning sought and anticipated yield.</p>		<p>The Submission seeks that the areas shown in blue shading in the figures below be subject to the General Residential “live zone”, and the remainder of the land comprising the proposed FDA2 remain FDA2 but subject to a 2-year development sequence (rather than 5-years as proposed in the PDP as notified):</p> <div data-bbox="893 507 1404 1034" data-label="Figure"> </div> <p>Figure 3: 251 & 273 Serviceable Area for Wastewater.</p>	

Information requested		Response	
		Submission No. 203.1 ²⁰	Submission No. 203.2 ²¹
		 <p>Figure 4: Pages Road Wastewater Extension</p>	
16.	Application of the requirements in the National Policy Statement for Urban Development in terms of development capacity beyond 'at least sufficient development capacity' for the purpose of Policy 2, and implications for integrated infrastructure and funding decisions (Objective 6).	Refer to response in (1) and (2) above.	
17.	Consideration against the relevant statutory framework for achieving a consolidated pattern of development (as required by the Canterbury Regional Policy Statement and notified PDP), which includes the provision of a 'co-ordinated pattern of development' ³⁵ including implications for amending timeframes associated with SCHED-15.	Refer to response in (1), (2) and (3) above.	

³⁵ CRPS, Policy 5.3.1(1)(a).

Information requested		Response	
		Submission No. 203.1 ²⁰	Submission No. 203.2 ²¹
18.	Service provision as set out in Attachment B to the Preliminary s42A Report.	Refer to responses in (2), (8) and (9) above.	

ANNEXURE B: DAVIS OGILVIE MEMORANDUM REPORT (DATED 4 OCTOBER 2022)

MEMORANDUM REPORT

To: Timaru District Council

Applicant:

From: Paul Jackson – Civil Engineer

Date: 04 October 2022

Subject: PAGES ROAD WASTEWATER EXTENSION

1 INTRODUCTION

Davis Ogilvie Aoraki (DO) have been engaged by TDC to prepare a design for improvements to Pages Road from Mountain View Road through to 325 Pages Road. As an extension to the road design, we are also to investigate options for extending the existing wastewater gravity main prior to road construction commencing. This is a very high-level study has been prepared to enable TDC to identify preferred option(s) for further investigation and proof of concept.

Under the Proposed District Plan (PDP) land to the north of Pages Road (up to 325 Pages Road) and west of Kellands Hill Road is listed as a Future Development Area (FDA2) to become General Residential within a 5-year timeframe.

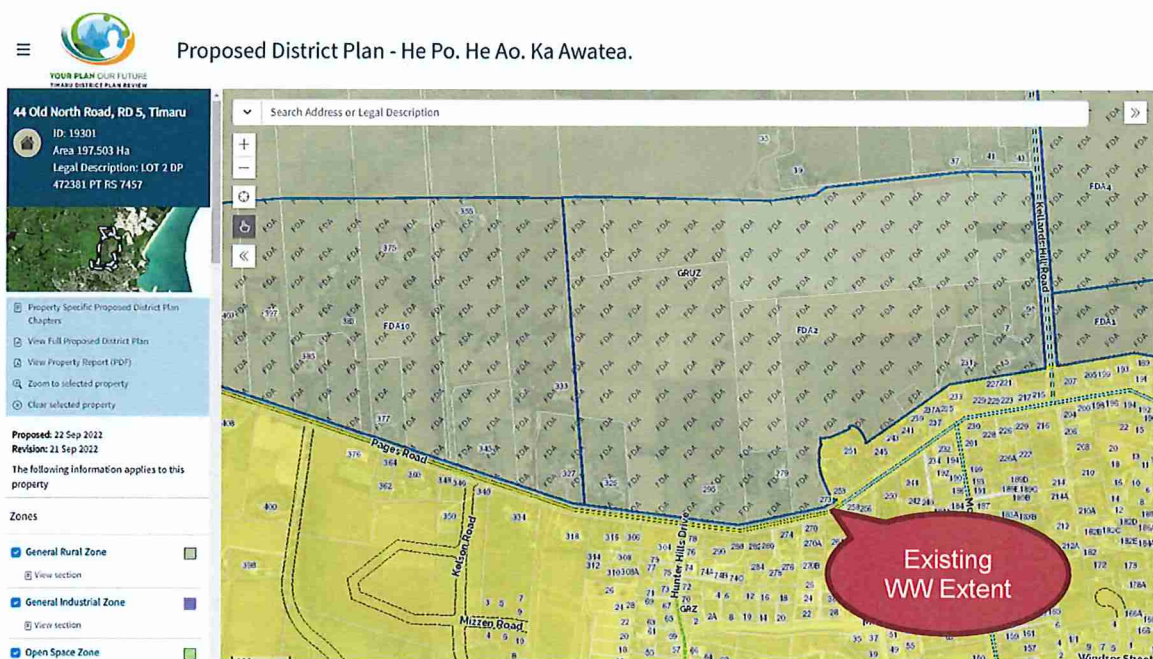


Figure 1: Pages Road west of Kellands Hill Road - Proposed District Plan

The existing Wastewater line terminates outside 264 Pages Road and is approximately 5.3m deep.

The land to the north of Pages Road falls to the north into what is an extension of Taitarakihī Creek and it is assumed that there will be a gravity wastewater main along the northern edge of FDA2. Depending on how development progresses, there would either be a pump station at Kellands Hill Road (with a rising main up to Pages Road) or there would be a gravity WW all the way adjacent Taitarakihī Creek through to Old North Road and ultimately the trunk main adjacent the Main South Railway Line.

West of 325 Pages Road the land is also a Future Development Area (FDA10) with this land proposed for future Rural Lifestyle Development with a 5-year priority. It is assumed that this will develop after the FDA2 land and will have access to the possible gravity WW on the north side of FDA2. Therefore, this land does not necessarily need a connection to the Pages Road WW.

The other key assumption is that all of the properties on the south side of Pages Road will drain to the south and do not require connection to the Pages Road WW.

There are four main landowners that are affected by an extension of the Pages Road WW:

- 251 Pages Road, Lot 1 DP 304081 & Lot 2 DP 397906, JS Crawford;
- 273 Pages Road, Lot 1 DP 531735, JC & TM Gresson
- 279 Pages Road, Lot 1 DP 75196, AL & PRC Pierce
- 295 Pages Road, Lot 2 DP 73425, PJ & SC Stray

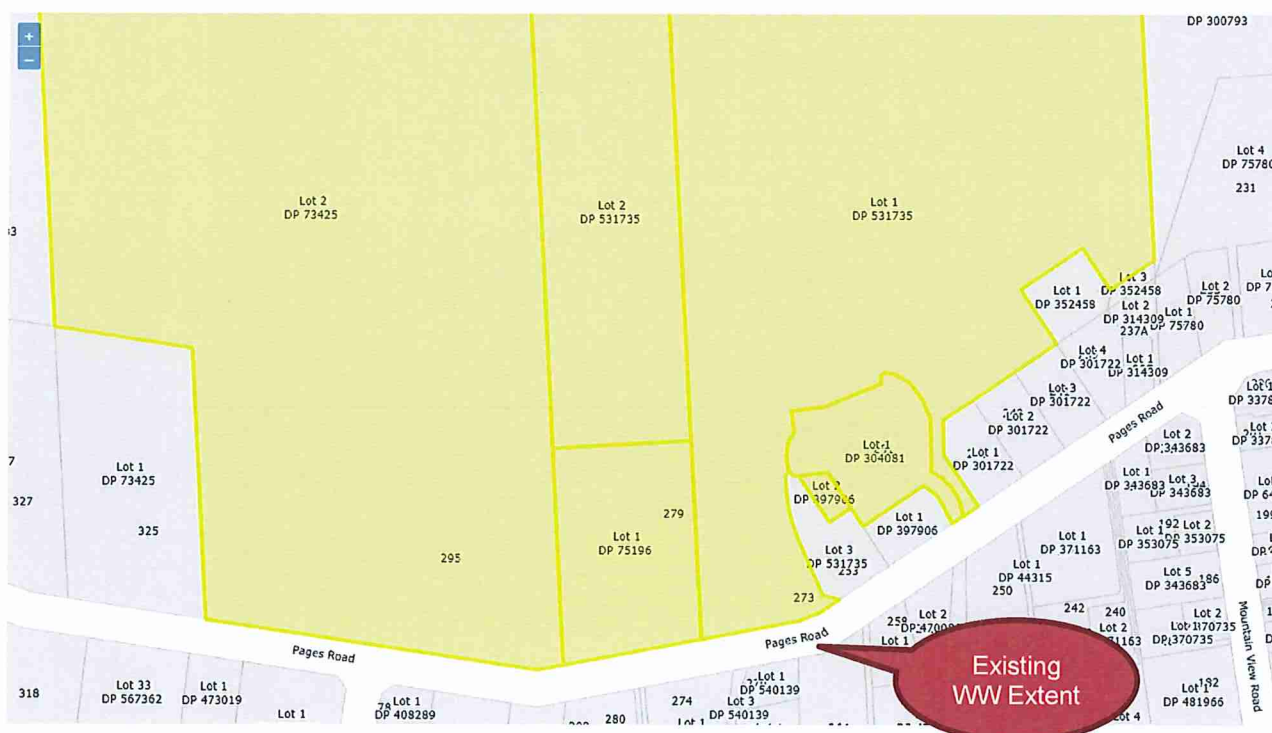


Figure 2: Properties considered in assessment of WW extension (yellow hatch)

2 REPORT EXCLUSIONS

This report does not take the following into consideration:

- Capacity of existing Pages Road Wastewater Infrastructure. This may limit the number of sections that could be connected to the existing main;
- The intent (or lack of) of the owners of the subject property to develop their properties;
- Unless previously investigated we have not considered future road layouts or development plans for the subject land;
- Landowners' general acceptance of an LPS system. Landowners should be consulted on this prior to any decisions.

3 DESIGN PARAMETERS

For the purposes of this assessment, we have used the following gradients to establish the land areas which can be serviced by the Pages Road WW.

WW Type	Minimum Gradient
WW Main	1.00% (1:100)
WW Lateral (Main to Boundary)	1.67 % (1:60)
WW Property Drainage	0.83% (1:120)

These are somewhat conservative in terms of NZS 4404:2010 but they do provide flexibility and also acknowledge that we are at the top of the line where minimum flow velocities may not be achievable.

A minimum of 0.5m cover is required on in property drainage and 0.80m within roads or for vested mains.

4 251 & 273 PAGES ROAD

4.1 Option 1 – Full Depth Gravity Main

As part of a previous subdivision on the Gresson property, at a very high level, DO looked at future development off Pages Road on the Gresson property. This has guided our thoughts on what could be achieved on this property. On the Crawford property we have taken an offset 5m in front of the house and assumed that this land may be developed some time in the future.

Our assessment is that by coming off ExWWMH-E at full depth then the following area of 251 and 273 Pages Road could be serviced (blue hatch – refer Figure 3):

- Excluding Possible Road is 7,200m² (estimate 12 – 14 Sections)
- Including Possible Road is 10,000m² (say developer chooses to develop with 2 x Row rather than road then there could be 15+ Sections).

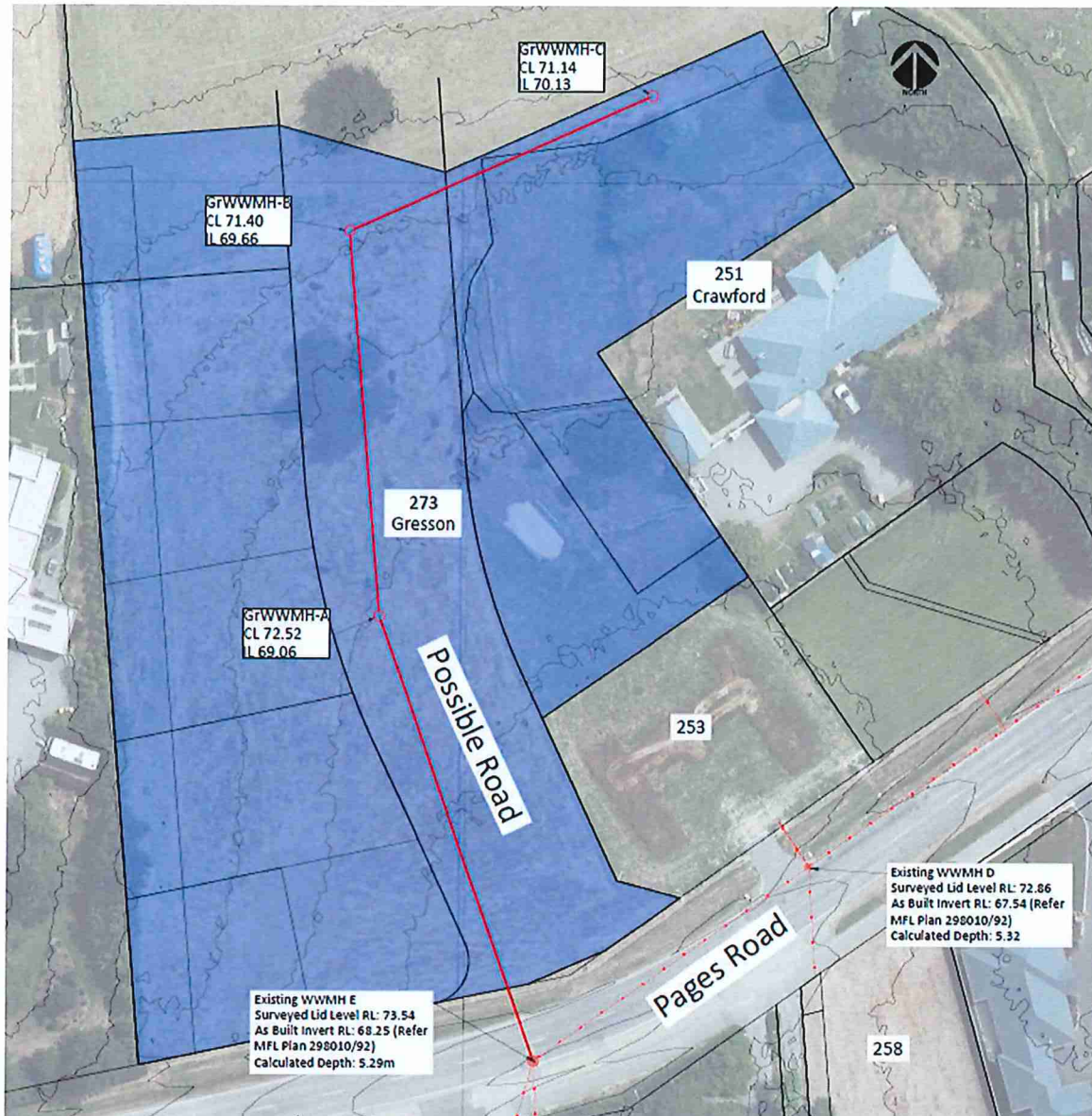


Figure 3: 251 & 273 Serviceable Area for Wastewater.

The key issue with this option is the installation of the first 70m of WW main which is up to 5.5m deep and it also crosses Pages Road at this full depth.

4.2 Option 2 – Low Pressure Pumping

This entire area could be serviced through a Low Pressure Sewer (LPS) system. To facilitate this, install a lateral connection (either gravity or PE pressure) into 273 Pages Road at a depth of around 2.0m.

5 279 & 295 PAGES ROAD

5.1 Option A – Extend Existing Wastewater at 1.0% Grade

This option involves extending the existing WW at a grade of around 1.0% past 279 and 295 Pages to the end of the proposed road construction. The blue hatch area in Figure 4 (Refer Attachment 1 for full size) is the extent that lateral drainage would extend before the cover is less than 0.5m. A 10m offset (dashed line) has been applied to the north extent of the blue hatch to give an indication of the land that may be serviced by this WW extension.

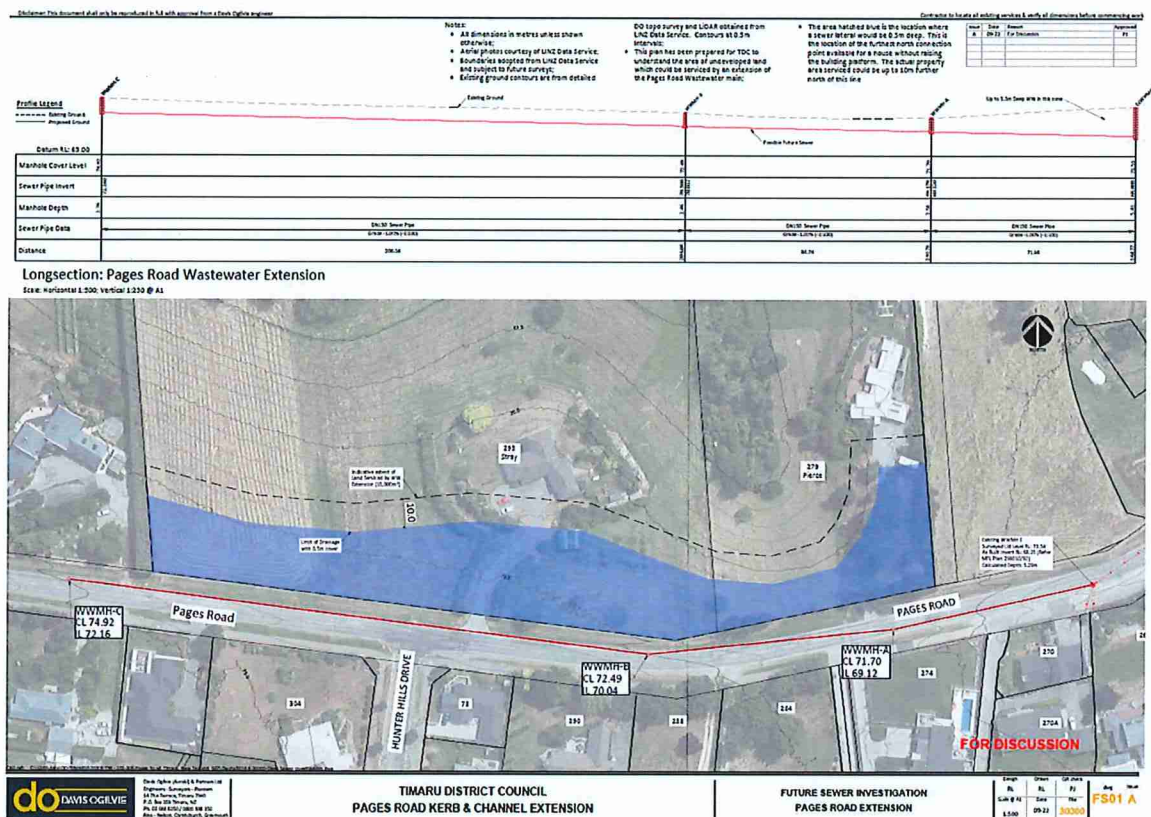


Figure 4: Pages Road Wastewater Extension

We estimate that close to 10,000m² would be serviced by the WW extension along Pages Road (Note that development at 279 Pages Road will likely require importation of fill to create effective allotments). The key issue with this option is the installation of the first 60m of WW main which is up to 5.5m deep within Pages Road. The remainder of the installation is at less than 3.0m deep below existing ground level.

5.2 Option B – Low Pressure Pumping

This entire area could be serviced through a Low Pressure Sewer (LPS) system. To facilitate this, install

a PE pressure pipe from ExWWMH-E through to 295 Pages Road at a nominal depth of 1.0m.

5.3 Option C – Wastewater Installation through Property with Earthworks (Indicative Only)

This option requires more investigation to confirm the feasibility but with filling of the sites (which would help level the sites) then a WW main to the north of Pages Road appears possible (refer Figure 5 and plan FS02 in **Attachment 1**). The extent of the serviceable land is entirely dependent on the amount of fill done but it is likely to be similar to Option A.

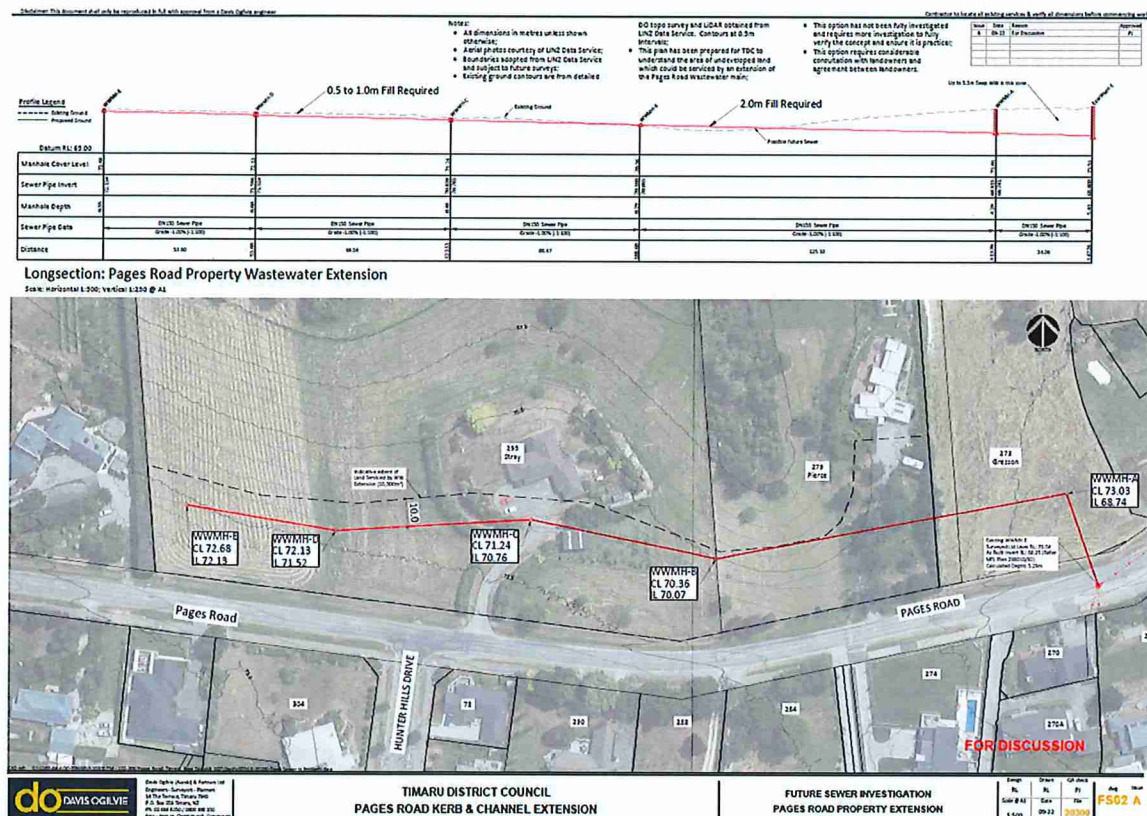


Figure 5: Plan showing location of possible Wastewater Main in Private Property

There are a number of issues with this option:

- Requires installation of WW main at 5.5m deep across Pages Road;
- Very deep WW main along future boundaries in the possible Gresson Subdivision;
- 4.3m Deep manhole in Future Gresson Road;
- Up to 2.0m of fill (Pierce property) required to achieve a reasonable level of development – typically in the order of 0.5 to 1.0m. Note that this may well be done to level the properties during house construction;
- WW main is in the rear of private properties which may create access issues for future

maintenance;

- Requires the property owners to work together to achieve the outcome for the upstream property owners.

The main advantages of Option C are:

- Only having to cross Pages Road with a Deep WW main rather than traversing along Pages Road at depth which will be very challenging;
- Future lateral connections in 279 & 295 would be much shallower and easier;
- The majority of the deep installation would be in greenfield where the up front installation would be much simpler.

6 DEEP WASTEWATER MAIN INSTALLATION

All gravity options involve installing 60-70 lineal metres of WW between 3 and 5.5m deep. Installing a five metre deep WW main is an expensive proposition with a number of other challenges:

- The original portion on Pages Road was installed with vertical sided trenches using a long-reach excavator (H&S wasn't what it is today) which is unlikely to be allowed today without large trench shields or braced sheet piling. Installing with an unsupported trench is likely not an option due to the size of the trench required. Geotechnical investigations and slope stability analysis may be an option to reduce the size of the trench required but this would require further expert advice.
- A pipeline 5.0m deep is extremely difficult to repair or service should there be leaks or blockage.

7 WASTEWATER MAIN LOCATION

A detailed analysis has not been carried out but there is no space for the wastewater main in the proposed berms. These are fully occupied with water, electricity and telecommunications infrastructure.

The most likely location is the middle of northern traffic lane. If extending the new wastewater is considered then we would likely have to reconsider the designed location of our proposed stormwater system to facilitate the wastewater infrastructure.

8 LOW PRESSURE SEWER

Modern LPS systems are robust and economical and could be a viable alternative to installing a very deep WW line should the developers proceed prior to completion of downstream infrastructure. Whilst LPS systems have ongoing energy and maintenance requirements this is potentially more palatable than a 5.5m deep WW in a major roadway that is difficult to maintain and connect to.

Prior to construction of the road TDC could install either shallow gravity mains or LPS infrastructure along Pages Road to each of the developable properties which would enable development out of

sequence with downstream properties.

The amount of land an LPS system could service is controlled by the capacity of the downstream WW infrastructure in Pages Road.

9 CONCLUSION

Extension of the Pages Road WW is only necessary if the FDA2 landowners west of Kellands Hill Road want to develop before WW infrastructure is brought up the Taitarakahi Stream Gully. If this main is not extended then an issue for TDC will be why was this WW extension not completed prior to road construction should downstream works be delayed and inhibit development of these properties.

Extension of the WW along Pages Road at full depth from ExWWMH-E provides future opportunities but the first 70m at up to 5.5m deep will be challenging to install, difficult to connect to in the future, and difficult to maintain should there ever be a problem.

All gravity options require installation of significant amounts of deep WW main which could be avoided by facilitating the use of Low Pressure Sewer systems, although these have disadvantages as well.

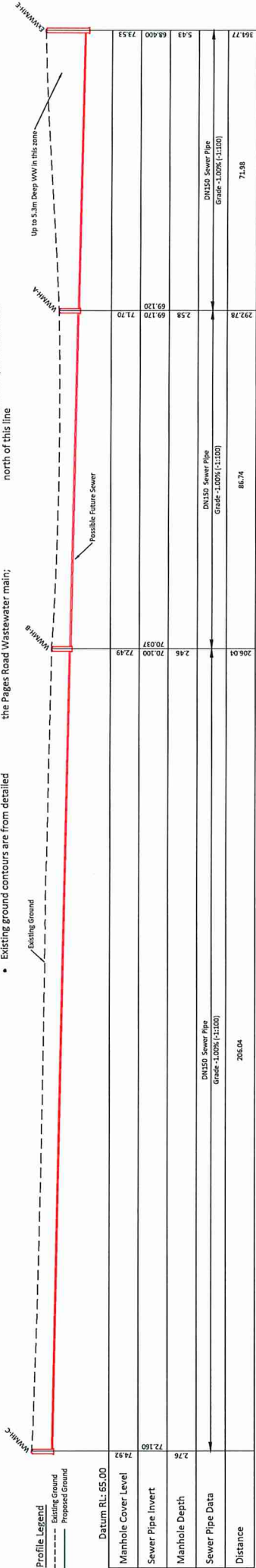
ATTACHMENTS

Attachment 1 – Full Size Plans for the Pages Road Extension Options

Issue	Date	Reason	Approved
A	09-22	For Discussion	PJ

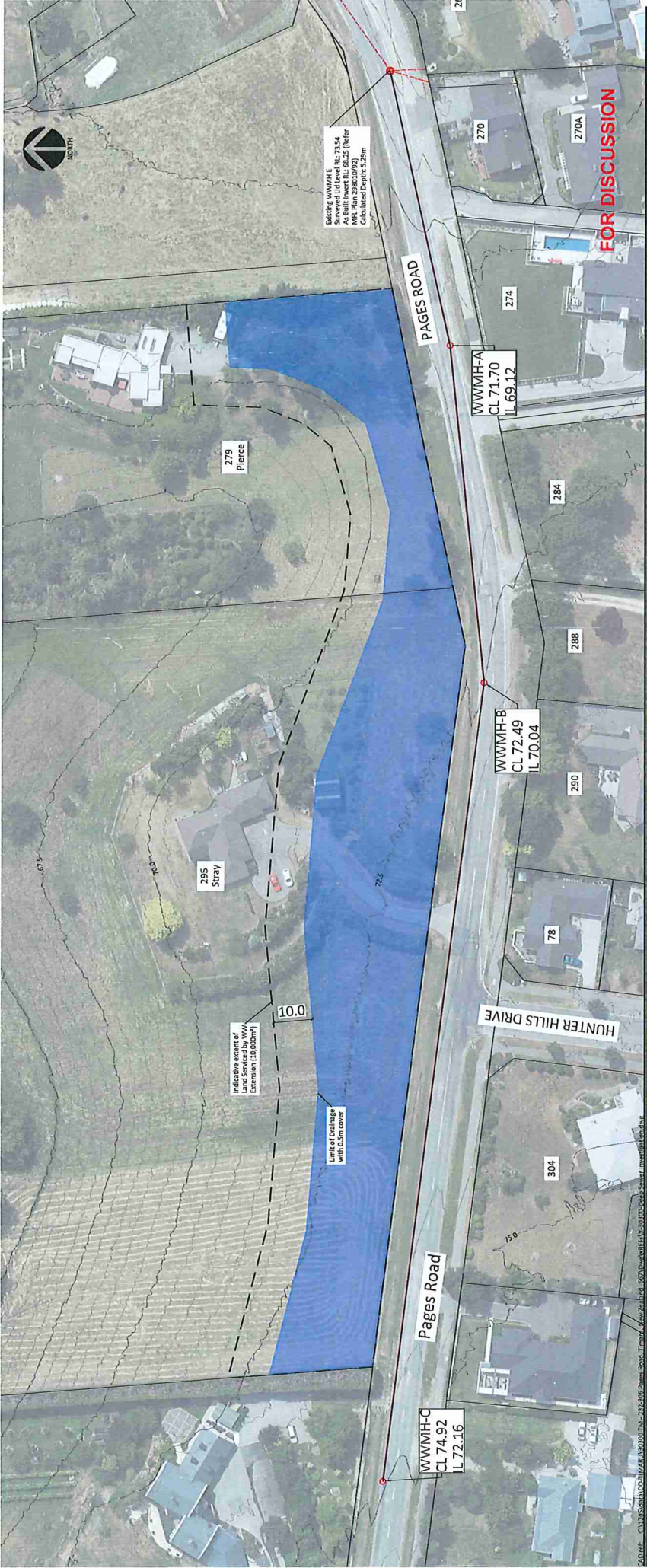
- DO topo survey and LIDAR obtained from LINZ Data Service. Contours at 0.5m intervals;
- This plan has been prepared for TDC to understand the area of undeveloped land which could be serviced by an extension of the Pages Road Wastewater main;

- All dimensions in metres unless shown otherwise;
- Aerial photos courtesy of LINZ Data Service;
- Boundaries adopted from LINZ Data Service and subject to future surveys;
- Existing ground contours are from detailed



Longsection: Pages Road Wastewater Extension

Scale: Horizontal 1:500; Vertical 1:250 @ A1



TIMARU DISTRICT COUNCIL
PAGES ROAD KERB & CHANNEL EXTENSION

FUTURE SEWER INVESTIGATION
PAGES ROAD EXTENSION

Design	Drawn	QA check	Issue
RL	PJ	RL	FS01 A
Scale @ A1	Date	File	
1:500	09-22	303300	

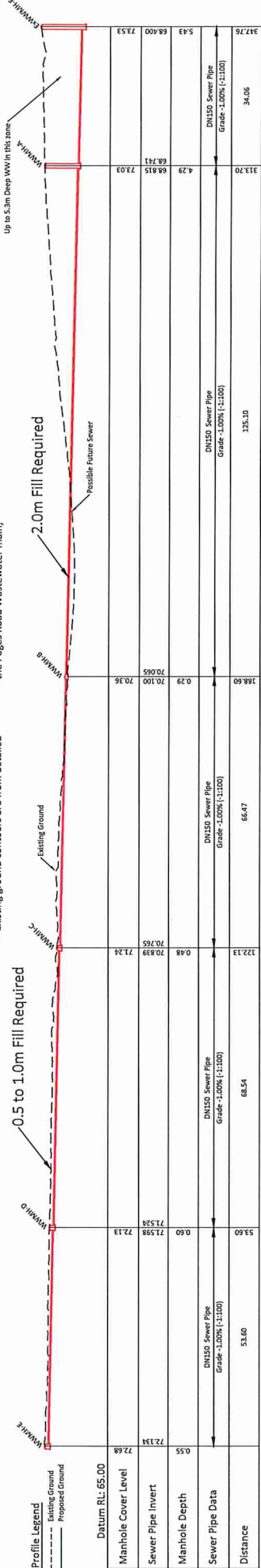
Davis Ogilvie (Auckland) & Partners Ltd
Engineers - Surveyors - Planners
4 The Terraces, Timaru 7640
Ph: 03 888 8350 / 0800 888 850
Also: Nelson, Christchurch, Greymouth



Issue	Date	Reason	Approved
A	09-22	For Discussion	PJ

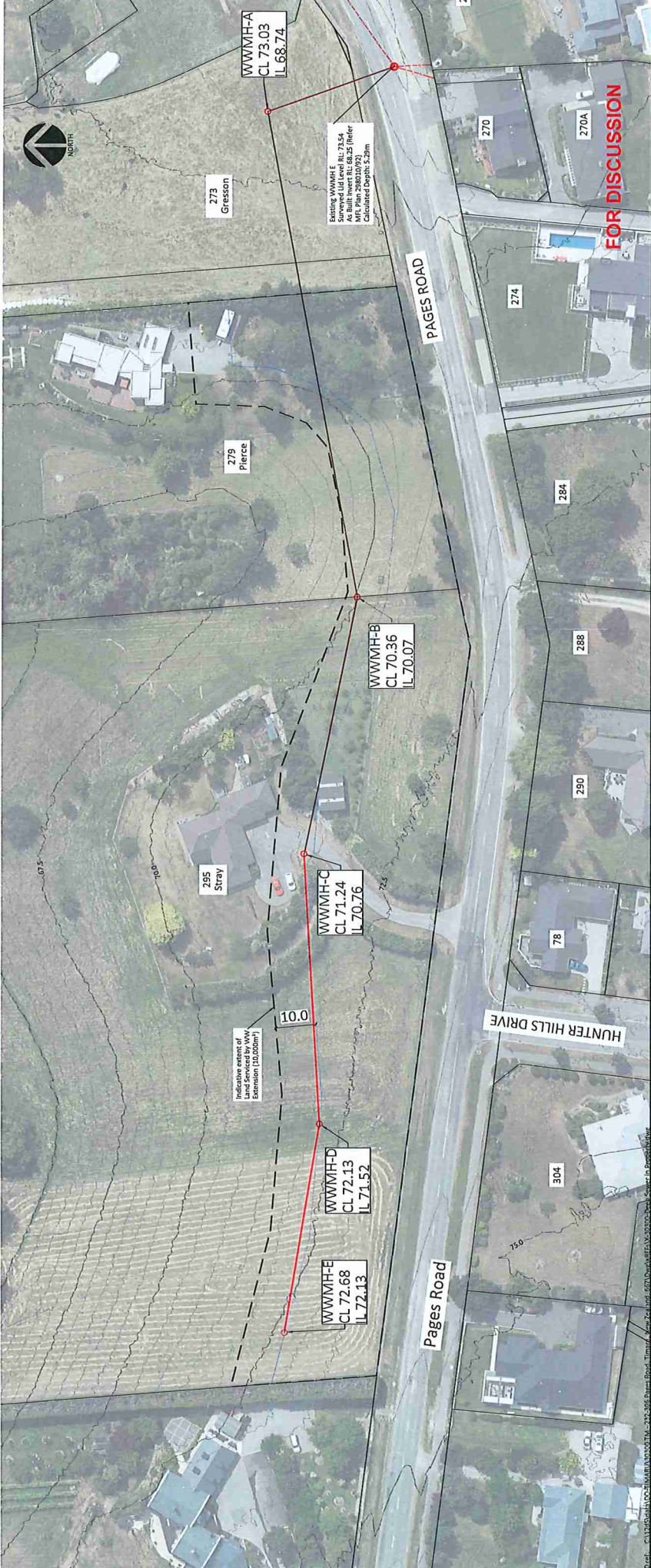
- DO topo survey and LIDAR obtained from LINZ Data Service. Contours at 0.5m intervals;
- This plan has been prepared for TDC to understand the area of undeveloped land which could be served by an extension of the Pages Road Wastewater main;
- This option has not been fully investigated and requires more investigation to fully verify the concept and ensure it is practical;
- This option requires considerable consultation with landowners and agreement between landowners.

- Notes:
- All dimensions in metres unless shown otherwise;
 - Aerial photos courtesy of LINZ Data Service;
 - Boundaries adopted from LINZ Data Service and subject to future surveys;
 - Existing ground contours are from detailed



Longsection: Pages Road Property Wastewater Extension

Scale: Horizontal 1:500; Vertical 1:250 @ A1



ANNEXURE C: PLANZ CONSULTANTS LETTER (DATED 18 FEBRUARY 2025)

Our Reference: J17076

18 February 2025

Email: timgresson@xtra.co.nz

Tēnā koe, Joanna and Tim.

Subject: Elloughton South, Elloughton North and Kellands Heights East Development Area – Project Progress

This letter provides you with a progress update on the Elloughton South (1), Elloughton North (4) and Kellands Heights East (2) Future Development Area (“FDA”) project.

As you will be aware, in late 2023 the Timaru District Council (“the Council”) engaged a project team to work in collaboration with Aoraki Environmental Consultancy (on behalf of Arowhenua) to investigate the infrastructure and residential development potential of FDAs 1/2/4 (shown in the Proposed Timaru District Plan (“the PDP”)). Early in the process, the team crafted the following project objectives:

- *Deliver densities that promote affordability, and the efficient use of land and infrastructure, while maintaining a Timaru ‘feel’.*
- *Deliver a cost-effective development model that minimises construction and operational costs while producing desirable environments.*
- *Restore and enhance cultural and ecological values to Te Ahi Tarakihi Stream.*
- *Require water sensitive engineering solutions which return flow to Te Ahi Tarakihi Stream.*
- *Promote connectivity and accessibility, which includes multi-modal transport options and a neighbourhood centre.*
- *Provide open green space which has district wide appeal (similar to Centennial Park).*
- *Manage the interface with regionally significant infrastructure to minimise effects arising from the proximity of dwellings.*
- *Provide opportunity for unforeseeable future growth that may occur within the district.*

Following an extended pause in 2024, technical reporting is now nearing completion, following which the team will prepare a set of provisions and a Development Area Plan (“the FDA package”) to inform the possible future development of the FDAs in a manner that would achieve the project objectives and respond to the opportunities and constraints identified in the technical reporting.

Early reporting indicates that the following broad development parameters may be appropriate:

- Development of 1200 households is possible across the FDAs (which achieves an overall density of 12 households per net hectare). This density optimises distribution of infrastructure costs and promotes the development of housing that will meet the Timaru market.
- This density will be achieved by developing a range of lot sizes and housing typologies. Higher density typologies (e.g. terrace houses) are supported in appropriate locations within the FDAs.

Initial thoughts are that varied densities (typologies) will be achieved through a precinct planning approach.

- A small neighbourhood centre within the FDAs is appropriate and is consistent with the PDP, which seeks to avoid distribution effects (avoid attracting retail and commercial activities from the district's main centres).

The **attached** draft concept plan provides you with a snapshot of where the project is headed, but it is important to note that this is not final and does not (in its current form) form part of the FDA package.

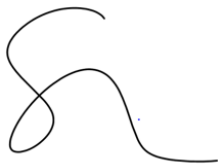
For the FDA package to have statutory effect, it will need to be subject to a statutory plan change process with decisions made by independent commissioners. Whether, and when, the Council takes the FDA package through the statutory plan change process is yet to be confirmed. It is also noted that the PDP settings (currently being heard) may change through that process, which may impact the FDAs and supporting policy framework.

Once the FDA package is complete, the Council will share the FDA package with stakeholders and provide an update on next steps. We will keep you informed as the project progresses.

If you have any questions or concerns, please do not hesitate to contact the undersigned.

Ngā mihi nui

PLANZ CONSULTANTS LTD

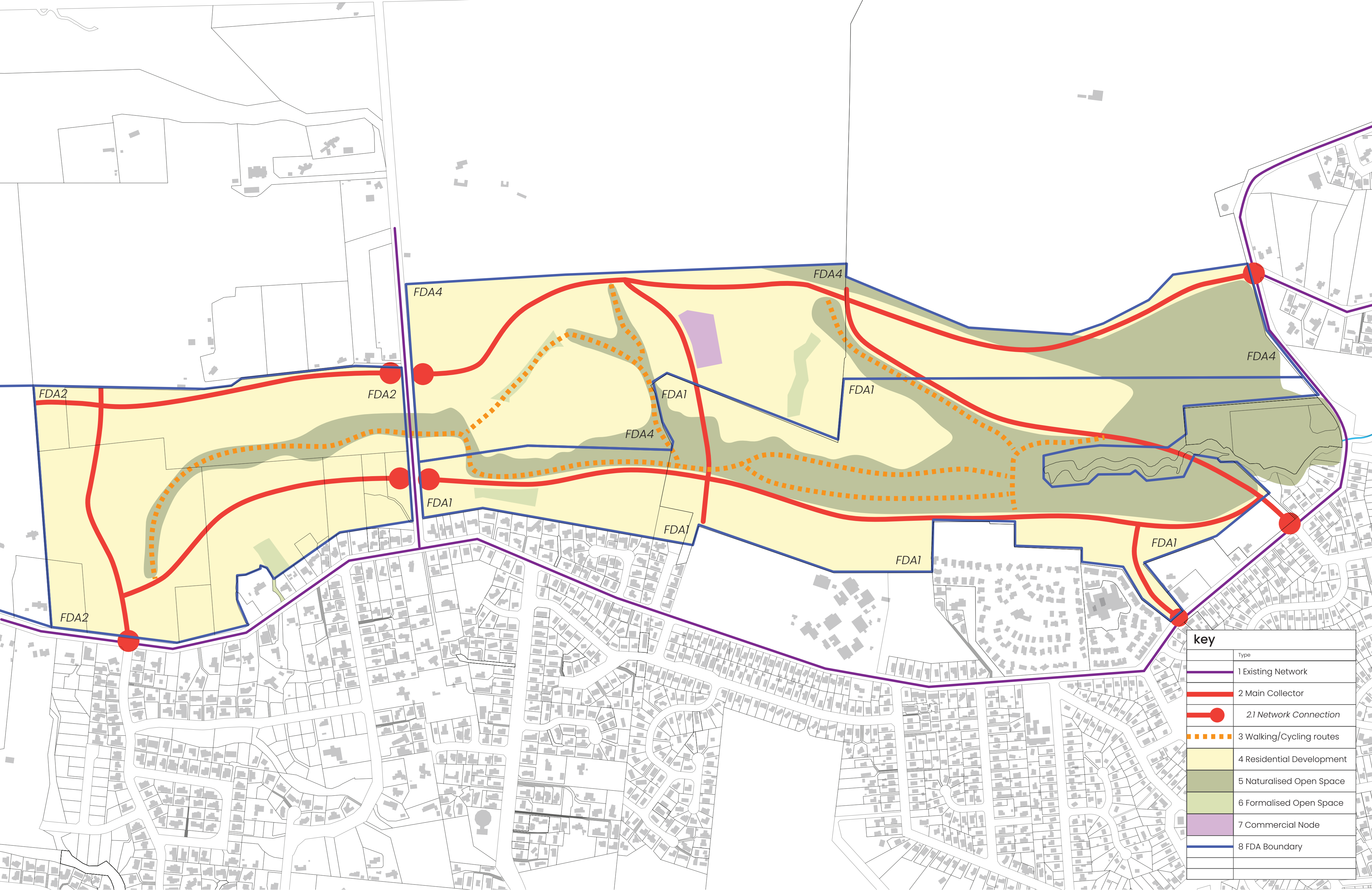
A handwritten signature in black ink, appearing to be 'S. Tait', with a stylized loop and a trailing line.

Susannah Tait

Partner

Phone: 022 451 9252

Email: susannah@planzconsultants.co.nz



key	
	Type
	1 Existing Network
	2 Main Collector
	2.1 Network Connection
	3 Walking/Cycling routes
	4 Residential Development
	5 Naturalised Open Space
	6 Formalised Open Space
	7 Commercial Node
	8 FDA Boundary



0

200

400m

rev	date	details	by
a	21.01.2025	issue to consultants	cc
b	30.01.2025	issue	cc
c	03.02.2025	issue	cc
d	05.02.2025	draft issue	cc

scale 1:5000	size A2
Do not scale drawings. Verify all dimensions on site	
drawn CC	date 05.02.2025

project	FDA 1/2/4	
name	outline development plan	
drawing	project 2323	rev a