



Timaru District Council
Timaru Urban Growth Strategy

Hearing Panel Decision Report

10 April 2018

1. BACKGROUND: STRATEGY DEVELOPMENT

In October 2014 the Timaru District Council resolved that a growth management strategy be prepared for the district.

The purpose of the GMS was to provide an overarching framework for managing growth, and to inform land-use zoning and integrate land-use planning and infrastructure provision, including the staging and allocation of infrastructure expenditure.

The intent was to provide a strategic management response to several key challenges facing the district over the next 30 years. Those challenges include:

- Modest household growth projections and an increase in older population cohorts;
- A history of incremental and unconsolidated rural residential development; and
- The need to provide an integrated approach to infrastructure provision and sustainable land supply.

The GMS is a non-statutory document but will inform Council documents such as Activity Management Plans, and the strategic priorities of the Long-Term Plan. The GMS will also inform the preparation of a reviewed Timaru District Plan. We note that the District Plan is to implement (*'give effect'* to) the relevant provisions of the Canterbury Regional Policy Statement (2013).

We were advised that a series of background reports identified the key issues/constraints to urban growth in the area and informed the development of the GMS. In addition, the GMS had been informed by:

- The Canterbury Regional Policy Statement and the principles of relevance in the Mahaanui Iwi Management Plan (2013); and
- Council strategic planning and policy, including the Long-term Plan, Infrastructure Strategy, Timaru District Plan and Parks Strategy.

The GMS proposes a vision, strategic directions (goals) and directions (policies) for Timaru District.

2. ENGAGEMENT & CONSULTATION

The Council was not required to undertake the special consultative procedure outlined in section 83 of the Local Government Act 2002 (LGA 2002). However, we were advised that the Council had consulted extensively with stakeholders in accordance with the principles of consultation as set out in section 82 of the LGA (2002).

We were advised that specific targeted consultation had been undertaken as follows:

DGMS Stage	Groups Consulted
Issues and Options Paper (July 2015)	Released for public feedback (two-week response phase)
Criteria and evaluative approach: <ul style="list-style-type: none"> • Growth Options Report (March 2016) • Growth Assumptions Report (February 2016) 	Agencies (i.e. Canterbury Regional Council, Transpower, Alpine Energy).
Preliminary DMGS	Canterbury Regional Council; Aoraki Development; KiwiRail; NZTA; Transpower, Alpine Energy; the South Canterbury Chamber of Commerce; and Federated Farmers. Geraldine, Pleasant Point & Temuka Community Boards.
Draft Growth Management Strategy & Summary and consultation document	Public and Agencies, including 'drop-in' sessions

3. PUBLIC NOTIFICATION & LATE SUBMISSIONS

The draft Timaru Urban Growth Strategy was publicly notified on 1 April 2017 with the submission period closing on 12 May 2017. During this period 75 submissions were received.

In addition, 4 late submissions were received. The Hearing Panel subsequently resolved to accept and consider the late submissions.

4. CONFLICTS OF INTEREST

At the commencement of the hearing both Mayor Odey and Cr Stevens declared a conflict of interest in respect of the submission made by Timaru District Holdings Ltd given they are board members. Given this situation, consideration and determination of the submissions fell to the Chair and Cr O'Reilly. Neither Mayor Odey nor Cr Stevens took part in the discussion or decision relating to the submission.

5. TIMARU GROWTH MANAGEMENT STRATEGY

The GMS is intended to assist the Council in achieving its role under:

- (i) The **Local Government Act 2002** purpose for local government, including: decision making on behalf of its communities; provision of infrastructure; and prudent financial decision making;

- (ii) The **Resource Management Act 1991** which directs the sustainable management of natural and physical resources. The land use outcomes of the GMS are to be implemented by the District Plan review (commenced 2016). The District Plan outcomes are governed by the Council's functions under s31 of that Act, and sections 74 to 77 which relates to matters to be considered and the contents of district plans. Section 75(3) requires land use outcomes in the District Plan that:

*"S75(3) ... must give effect to –
(c) any regional policy statement"; and*

- (iii) The **Land Transport Management Act 2003** which governs the way in which New Zealand's land transport system is developed, managed and funded.

The GMS will provide an agreed macro level strategy for the management of land use growth in the District.

The Panel agreed that the GMS should not put forward approaches that would not achieve, or give effect to, the established regional frameworks established in the CRPS.

Growth Projections & Council Statutory Responsibilities

We were advised that the GMS has utilised as its base, the New Zealand Statistics Medium Growth Projections.

Mr Heath had identified the importance of the use of the Medium Growth New Zealand Statistics Projections:

*"Property Economics have utilised the SNZ Medium Series projections as this is the base requirement in the National Policy Statement on Urban Development Capacity. SNZ projections are generated from significant data inputs and dynamic variables monitored by SNZ. SNZ projections are also viewed as independent and credible and form part of their statutory obligations. They also represent the base projection series utilised in Environment Court with any deviation from SNZ projections having to be very well justified."*¹

Mr Heath also identified that the recent updates from Statistics New Zealand (NZS2017) should be applied to the finalised Growth Management Strategy. The use of the NZS2017 projections aligns with the wording used in the NPS-UDC, that seeks that Council's account for demographic change using the most recent Statistics New Zealand Population Projections².

The Timaru District Council has a statutory basis for planning for housing and business land to meet demand, and the integration of infrastructure to meet such demand. In summary:

¹ Property Economics. Section 1.

² National Policy Statement -Urban Development Capacity (2016). Policy PB2(a).

- **Resource Management Act: Section 75(3)(a)** ‘Contents of District Plans’ states that a District Plan is to *give effect* to any National Policy Statement.

The NPS-UDC requires local authorities to ensure that at any time there is sufficient housing and business land development capacity for the *short, medium and long* term (as set out in the requirements of **Policy PA1**). **Section F** of the GMS sets out the long term projected demands for housing and business in the main urban settlements. The GMS identifies such a buffer demand for both business land and housing, despite there being no statutory requirement to provide such. This is undertaken in **Section A:2.4** ‘Growth Areas’ of the GMS.

- **Resource Management Act: Section 75(3)(c)** ‘Contents of District Plans’ states that a District Plan is to *give effect* to any Regional Policy Statement.

The Canterbury Regional Policy Statement (2013) CRPS, sets out the relevant regional framework for managing land use and infrastructure (Chapter 5). Relevant and detailed provisions of the CRPS are identified and applied in this report when considering relevant submissions.

- **Resource Management Act: Section 31(1)(a)** the Council’s statutory mandate to ensure the *‘integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district’*.
- **Resource Management Act: Section 31(1)(aa):**
“(aa) the establishment, implementation and review of objectives, policies and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district”.
- **Local Government Act: Section 10:**
The purpose of local government is –
 - (a) *to enable democratic local decision-making and action by, and on behalf of, communities; and*
 - (b) *to meet the current and future needs of communities for good-quality local infrastructure, local public services, and performance of regulatory functions in a way that is most cost-effective for households and businesses.*

In summary, the Timaru District Council is required to provide for projected demand, but to do so in a way that is both prudent, environmentally sustainable and integrated, robust, and is the most cost-effective in terms of meeting associated needs for good-quality local infrastructure and local public services.

The GMS identifies that a ‘Managed Growth Approach’ represents the most effective approach to achieving these aims, which seeks consolidated and limited expansion as necessary in strategically located areas.

As outlined by Mr Heath, the NZS Medium Series projections provide a robust and proven foundation for identifying likely future demand. It is acknowledged that any forecast is simply that and will be subject to change.

The NPS-Urban Development Capacity impose a statutory obligation for the Timaru District Council to undertake '*A robustly developed, comprehensive and frequently updated evidence base to inform planning decisions in urban environments*' (Objective OB1). Whilst not mandatory to Timaru District³, the NPS-UDC identifies the need for local authorities every three years to carry out a housing and business development capacity assessment (Policy PB1) that:

- (a) *Estimates the demand for dwellings, including the demand for different types of dwellings, locations and price points, and the supply of development capacity to meet that demand, in the short, medium and long-terms;*
- (b) *Estimates the demand for the different types and locations of business land and floor area for businesses, and the supply of development capacity to meet that demand, in the short, medium and long-terms.*

Section G:2 of the GMS 'Monitoring and Review' requires a three-yearly review of major changes in demographics, as well as monitoring key indices associated with:

- *Residential development (number, type, location, land area, density and rate of take up of new households);*
- *Commercial development (number, type, location, land area and rate of take up of new commercial developments);*
- *Industrial development (number, type, location, land area and rate of take up of new industrial developments); and*
- *Rural living development (number, type, location, land area and rate of take up of new households).*

We observe that while projections provide a foundation for identifying future demand for residential and business land demand, monitoring is a key element of successful strategy implementation. It is noted that while the NPS-UDC has monitoring requirements for the "high growth Council areas" the provisions were not as previously noted mandatory to Timaru District.

However, the GMS outlines monitoring requirements and we are of the opinion that these monitoring provisions be implemented as they provide a basis for having sound data and evidence.

We cannot stress enough the importance of having effective monitoring and reporting frameworks in place given the dynamic environment of population and demographic changes and that projections are just that.

³ As the settlements are not defined as either a *medium-growth urban area* or *high-growth urban area* under the NPS-UDC.

6. HEARINGS

- **Hearing Panel**

The panel comprised of Mr Bill Wasley – Independent Commissioner Chair, Mayor Damon Odey, Cr Kerry Stevens and Cr Paddy O'Reilly.

We were appointed by the Council to hear submissions, consider all submissions received, consider the reporting officer recommendations, determine all submissions and any associated amendments to the draft strategy.

- **Hearing**

The hearing of submissions was held on 6 & 7 December 2017 in the Timaru District Council Chambers.

On the 8 December 2017 the hearing continued with the panel posing a number of questions to the reporting officer, Mr Bonis. At the conclusion of this session, the hearing was adjourned, and the panel conducted a site visit to various parts of the District related to submissions made. Only the panel conducted the site visit which included visiting;

- Washdyke Industrial area
- Levels area (R/R)
- Temuka
- Geraldine
- Various rural/ residential zoning proposals surrounding Timaru
- Woodbury

- **Documents Provided**

The panel had been pre-circulated with the reporting officers report, the Property Economics report, all submissions and some pre-circulated evidence.

- **Process**

The hearing commenced with an overview of the proposal by Mr Matt Bonis and presentation of the Property Economics report by Mr Tim Heath. We then heard from all submitters who wished to be heard. Mr Bonis then provided commentary on matters raised at the hearing and his response to those. We then posed a range of questions to Mr Bonis, and Mr Heath.

- **Hearing Attendance**

Parties in attendance during all or part of the hearing were as follows:

Council

- Mr Matt Bonis – Planning Consultant
- Mr Tim Heath – Economic Consultant
- Mr Mark Geddes – District Planning Manager
- Mr Fraser Munro – Development Manager

Submitters

Description	Appearance	Submitter Name
Submission 51 & 52	Bruce Pipe	For Port Bryson Property Limited & B Pipe
Submission 41	Rose Orr	For Community and Public Health
Submission 27	Roger Payne	For R Payne
Submission 9	Ian Geary	For I Geary
Submission 22 & 59	Nigel Gilkison	For N Gilkison & Timaru Civic Trust
Submission 25	Bob Douglas	For South Canterbury Federated Farmers of New Zealand
Submission 46	Tim Walsh	For South Canterbury Chamber of Commerce
Submission 6	Tim Walsh	For M Thompson
Submission 70	Tim Walsh / Glen McLachlan	For Davis Ogilvie
Submission 66	Glen McLachlan	For A McCleary, and G & M Ladbrook
Submission 67	Glen McLachlan	For LP & JA Moodie
Submission 71	Andrew Rabbidge / Glen McLachlan	For South Canterbury Branch, New Zealand Institute of Surveyors
Submission 65	Grant Gilbert & Jo-Ann Hammond / Andrew Rabbidge	For Riverside Estate (2008) Limited, and DE Ngaha & JM Hammond
Submission 24 & 48	Shane Dale / Andrew Rabbidge	For Sub 24 Seadown Properties & Sub 48 SM Fraser, AJ Shaw and PA Johnston
Submission 17	Gerald Morton / Andrew Rabbidge	For GA Morton Family Trust from Gerald Morton
Submission 54	Brian Lobb	For Milward Finlay Lobb Limited
Submission 73	Bruce Speirs	For B Speirs
Submission 31	Alan Young	For Al Young
Submission 32	Alan Young	For Al Young, Martock Holdings Limited, N Campbell, NL Newton, Mountain View Daries, D & M Shefford, R Taylor, and P Hobbs
Submission 21	John Shirtcliff	Insights Consultancy
Submission 2	Lee Burdon	L Burdon
Submission 49	Johnny & Don McFarlane	McFarlane Family Trust

Description	Appearance	Submitter Name
Submission 16	Joy O'Keelee & David Earl	BJ & JEM O'Keefe, DG & ML Earl, and J & S Nichelsen
Submission 38	Ir. Johan Hendriks	Alpine Energy
Submission 57	Development and Asset Manager (Jerome O'Sullivan) and Planning Consultant (David Haines)	Harvey Norman Properties (N.Z.) Limited
Submission 35	Chris Fowler	Foodstuffs
Submissions 36, 43, 44, 45, 47, 50, 55, 56, 58, 60, 61, 62, 63, 64, 68	Andrew Rabbidge	
Submission 20	Julia Forsyth	Canterbury Regional Council

We wish to record that we received from Gresson Dorman & Co (Jane Walsh) correspondence dated 5 December 2017 on the second day of the hearing. The correspondence related to Submission No 18 from the Rolling Ridges Trust, Russel & Pages Trust and Simstra Family Trust. We were advised that the submitters no longer wished to be heard.

Furthermore, it was noted that the original submission had opposed the proposed Rural Residential zoning as it related to a strip of land 50 metres wide and sought to be identified as proposed Residential 6 zoning adjacent to Pages Road.

The advice also outlined that the submitters had had the opportunity to review Mr Bonis's report and agreed with his recommendation that their land be defined for Rural Residential zoning.

We consider that the submitter's amendment supporting the rural residential zoning as defined in the draft GMS, is within the scope of the original submission and that we are able to consider it.

Accordingly our consideration and determination of this matter is outlined in Appendix 1 in respect of submission 18.

7. SUBMISSION THEMES

We were advised that a range of major themes emerged from the consultation and submission process including:

- General support for the approach as to the provision of a range of housing types and managed consolidation.
- The implications of modest growth projections and changing (aging) demographics.
- Support for consolidating commercial centres.
- Support for the zoned provision of rural residential development in the District, albeit with many parties seeking a rural residential rezoning (some 350ha in addition to that identified in the Draft GMS).
- Whether the growth predictions applied to the GMS are too conservative, and insufficient zoned land has been provided, particularly zoned rural residential opportunities at Timaru.
- Whether the business approach is too restrictive and opportunities for growth and employment will be lost.
- Council should provide water and sewer connections for rural residential zones.
- Support for the integration of land use with transport choices is supported.
- Heritage should be retained and restored as much as possible, including Timaru settlements CBD heritage buildings.
- Whether the Draft GMS appropriately deal with resilience and natural hazards, i.e. Sea level rise implications for Washdyke.

It is notable that there was considerable support expressed for the development of a GMS. There was also support for the approaches contained therein for provision of a range of housing typologies and the theme of managed consolidation such as that applying to rural residential development.

Several submitters believed the GMS was too conservative in providing for residential, rural and business land growth.

However, any propositions in our opinion need to be based on evidence and stand up to and withstand scrutiny. The Council had commissioned Property Economics to undertake relevant assessments regarding provision of land to cater for growth out to 30 years.

Those projections are based on the Statistics NZ Medium Series. We observe that whilst some submitters were of the view that both population projections and forecast land requirements were too conservative, no alternative evidence including projections were provided to us during the hearings.

We also note that the provisions of the Canterbury Regional Policy Statement have been fully considered by the Council in developing the GMS. The RMA requirement is that District Plans give effect to any Regional Policy Statement provisions. It is clear to us that the GMS provisions have considered and reflect the provisions of Chapter 5 of the CRPS 'Land-Use and Infrastructure' and the relevant provisions in Chapter 11 as these relate to hazards.

7.1 Rural Residential Approach

The GMS proposes a change in approach to the provision of rural residential opportunities in the Timaru District. We were advised by Mr Bonis that the operative

Timaru District Plan (2005) did not have any strategic policy and approach for the management of rural residential opportunities. The District Plan provides for dispersed rural residential development through an 'entitlement approach' which *"enables relatively small rural allotments and land use for single households across the Rural 1 zone as related to a larger balance lot. A number of discrete small lot rural subdivisions have been created in rural areas predominantly as located around the Timaru township in a manner not consistent with the strategic approach set out in the District Plan"*⁴.

The GMS provides for a targeted and zoned response to provide for rural residential opportunities. Mr Bonis advised⁵ that this was based on:

- The adverse effects of dispersed or oversupplied rural residential development
 - Reverse sensitivity adverse effects from accepted impacts generated by farming, factory farming and rural industrial activities.
 - The reduction of farming and productive opportunities through land fragmentation and modification of land for rural residential purposes.
 - Implications on infrastructure, including traffic safety through additional accesses to service rural residential development, and expectations for servicing.
 - Expectations and requests for infrastructure servicing.
 - Impacts on water quality.
 - Reduction of rural visual character by rural residential buildings and activities.

Furthermore, we were referred to Chapter 5 of the CRPS by Mr Bonis which seeks to provide a directive approach in respect of the provision of rural residential opportunities:

"...seeks to enable and provide for rural residential opportunities in terms of providing sufficient housing choice (Objective 5.2.1(b)).

Caveats include that rural residential development does not detract from:

- *an overall approach of urban consolidation Objective 5.2.1(a), Policy 5.3.1(1)(b) and Policy 5.3.2; and*
- *are limited, and of a form that concentrates or is attached to existing urban areas (Policy 5.3.1(1)); and*
- *do not foreclose the productivity of the region's soil resources, including through fragmentation (Policy 5.3.2(1)), Policy 5.3.12(1)).*

The definition of Rural Residential contained in the CRPS is as follows:

*"Rural Residential development means zoned residential development outside or on the fringes of urban areas which for primarily low density residential activities, ancillary activities and associated infrastructure."*⁶

The GMS seeks to replace the 'entitlement approach' provided for in the operative District Plan with a targeted zoned approach which is to be reflected in the proposed

⁴ Section 2.1.4 – Consultation Summary and Office Recommendations : November 2017

⁵ Section 2.1.4 – Consultation Summary and Office Recommendations : November 2017

⁶ Section 2.1.4 – Consultation Summary and Office Recommendations : November 2017

District Plan. This seeks to manage the location and quantum of rural residential opportunities in Timaru District. Specifically this includes:

- “The location of Rural Residential development is to be focussed (and *occurs in a form that concentrates, or is attached to, existing urban areas* (CRPS Policy 5.3.1(1)(b)),
- The quantum by which Rural Residential development contributes to all residential growth in the District should not derogate from primary focus on *concentrating and consolidating existing urban areas* (CRPS Objective 5.2.1(1), Policy 5.3.1(1)(b).”⁷

In respect of submissions received relating to the rural residential provisions, there was general support for the proposed zoned approach as outlined in the GMS, although a small number of submitters sought a continuation of the current approach contained in the operative District Plan. Mr Bonis recommended that submissions supporting a continuation of the existing approach be rejected.

Having considered this matter we concur that the current rural residential approach is not appropriate and not in accord with the provisions of the CRPS, and the reasons are documented in Mr Bonis’ report.

Those submissions seeking or supporting a targeted zoned approach have been accepted. However, we have given consideration to several submissions seeking a rural residential zoning. Those that did not meet the policy direction contained in the GMS and CRPS we have rejected. We have also had regard to the population projections for the Timaru District and an increased population to be provided for.

Notwithstanding our decisions in respect of rural residential submissions, we believe that the ‘Levels’ area adjacent to Timaru Airport requires further consideration. It is an area that contains rural residential/lifestyle type land uses now. It seems appropriate to us that this area be further considered by the Council for some type of lifestyle/rural residential use. We believe it is inappropriate to consider this now as part of the GMS process as further evaluation and engagement with landowners, NZTA and adjacent landuse activities/owners is required.

It seems to us that there is already a level of activity in existence and this coupled with the aspirations of the Levels Golfing Lifestyles Ltd and Timaru Golf Club are considered to be worthy of further investigation. Ideally it would seem appropriate to undertake this work so any outcomes from it are included in the proposed District Plan when notified.

In respect of a number of other submissions seeking a rural residential zoning, we have given consideration to these as possible additions to the areas already proposed by the GMS for rural residential purposes. However, the areas are not attached to existing

⁷ Section 2.1.4 – Consultation Summary and Office Recommendations : November 2017

urban areas or concentrate such development in relation to urban areas. Furthermore, the question is how much provision should be made for rural residential activity, which we discuss in section 7.2 of this decision.

We note that such development is only one element of housing that is to accommodate the projected increase in population in the District over the next 30- year period.

An exception to this approach has been provision for rural residential adjacent to the already defined Kelland Heights rural residential area. We consider this was appropriate given it is adjoining the Kelland Heights area and supports a consolidation approach.

7.2 Rural Residential Demand

We also wish to make some observations regarding rural residential demand given the number of submissions received on this matter, that highlighted in the view of submitters, that there was insufficient provision for Rural Residential Zoned areas.

Section 4.5 of the Consultation Summary and Officer recommendation report commented as follows;

“The DGMS identifies that between 2005 and 2015, 16% of the District residential building consents was allocated to rural residential development. A continuation of those projections would require supply for 288 dwellings (16% of 1,800²⁸) The DGMS provides sufficient capacity to provide for rural lifestyle opportunities with capacity for 465 dwellings at 5,000m², or 233 dwellings at 1ha. Against a backdrop of urban consolidation, additional volumes through dispersal or additional rural residential zonings are considered inappropriate. If the full capacity of 465 dwellings were taken up then this represents over a quarter of all household growth over the coming 30 years being provided through this one housing typology.”

Furthermore, the report observes that calculating demand for rural residential development is difficult, which is in part due to the current District Plan exemptions approach, which enables a disjointed supply, that can occur throughout the District.

The GMS focuses rural residential development in the Timaru District to achieve consolidation in and attached to existing urban areas with limited opportunities for rural residential development.

We note the relevant CRPS objective and policy being;

- **CRPS Objective 5.2.1** seeks that ‘development is located and designed so that it functions in a way that:
 - (1) Achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region’s growth; and
 - (2)(b) provides sufficient housing choice to meet the region’s housing needs;

- CRPS **Policy 5.3.1**, as identified, seeks to *ensure limited* rural residential development occur in a form that concentrates, or is attached to, existing urban areas and promotes a *coordinated* pattern of development.

Mr Bonis was of the opinion that;

“reliance on the linear extension of previous building consent data to determine rural residential demand is considered inappropriate due to the following:

- a) A directive Regional Policy Statement that identifies that rural residential development is to be limited and subservient to an overall approach where growth consolidates existing urban areas.*
- b) The NPS2017 growth projections that identify an overall slow-down in growth, with a 2048 demand for 1,800 new dwellings within the District²⁹.*
- c) An aging population, and the composition of households to also likely change, with a proportional decrease in ‘family households’ and an increase in ‘one-person households’³⁰ which likely decreases demand for space extensive rural residential properties.”*

He further stated that;

*“The CRPS **Policy 5.3.1** identifies that the provision of Rural Residential development should be limited to satisfy a segment of household choice. Converting significant tracts of rural land to facilitate rural residential development to address affordability, or satisfy market demand is not consistent with the consolidation aims of the CRPS.”*

Mr Bonis noted;

“that determining ‘sustainable demand’ for Rural Residential development in the DGMS is guided by:

- *What would constitute limited supply of this segment of the household market (**CRPS Policy 5.3.1**);*
- *the modest extent of growth forecast for the district, and using that household growth primarily to consolidate (**CRPS Objective 5.2.1(1)**) and concentrate urban areas (**CRPS Policy 5.3.1(1)**).*
- *That the 2005 to 2015 average of 16% of the district’s building consents for dispersed rural residential development represents an inappropriate high-water mark, given the directive approach in the CRPS.”*

We observe that based on the NZS2017 forecasts, the proportion of total household yield provided for by rural residential development at 5%, 10%, 15% and the status quo of 16%.

It is considered that a quantity between 5% and 10% of all household growth to 2048 would be more consistent with the CRPS approach outlined in **Policy 5.3.1**, and yet still provide for demand of this housing type. As noted above, the capacity identified in the GMS for rural residential housing is approximately 15-25% depending on ultimate densities.

Mr Bonis further noted that;

“the GMS provides sufficient capacity to provide for rural residential opportunities with capacity for 465 dwellings at 5,000m², or 233 dwellings at 1ha. Conservatively, applying the lower figure of 233 illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long-term demand (to 2048) can also be accommodated of between 90 – 180 dwellings.”

As discussed elsewhere in this decision, monitoring is a key element of strategy implementation so continual evaluation of both zoned supply and demand is undertaken and can be responded to with strategy changes if required. The GMS is not a tablet of stone but provides strategic direction and should be considered a living document as informed, and necessarily amended, based on the Monitoring Requirements in Section G:2.

We find that there is adequate provision for rural residential activity subject to some additional modest provision such as at Woodbury, and adjacent to the proposed Kelland rural residential zone which adjoins the Timaru urban area.

7.3 Population Projections

Section 5 of this decision discusses growth projections and the use of the NZS Medium Series Projection. Mr Heath stated that in his opinion the projections provided a robust and proven basis for identifying likely future demand. A range of submitters outlined in their submission and at the hearing that the projections were too conservative, that the Council should be more aspirational in respect of its population projections and that additional rural residential, business/commercial and residential land should be provided for.

We have considered such matters and concluded that there was no evidence presented to us that provided alternative projections. Whilst several submitters questioned the use of the NZS Medium Series projections and then the associated requirements for land to accommodate such, we were not provided with any expert evidence as to what any alternative projections should be used for the GMS.

In the absence of such robust alternative projections we feel we are obliged to confirm the use of the NZS Medium Series projections as being appropriate for the GMS. Indeed, there is a statutory basis on which to utilise the projections which we have outlined in our decisions on various submissions.

In addition, as previously noted in section 5 of this decision the GMS and associated projections are not a “tablet of stone” and can be changed. As we observe the GMS provides for a 3- yearly review of demographic information together with land uptake for residential, rural residential and business land.

8. DECISIONS

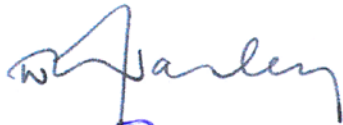
- 8.1 *That the late submissions be accepted for consideration by the Hearing Panel.*
- 8.2 *That the submissions as outlined in Appendix 1 be accepted, accepted in part or rejected for the reasons outlined.*
- 8.3 *That the GMS be amended in accord with the decisions made in respect of accepting or accepting in part of submissions.*
- 8.4 *That it be recommended to the Timaru District Council to approve the GMS subject to amendments made as a result of decisions made by the Hearing Panel on submissions.*
- 8.5 *That the Timaru District Council undertake an investigation in respect of the “Levels” area (as described in our detailed decision on this matter) to consider its appropriateness for some comprehensive lifestyle type development provisions as discussed in this decision, for incorporation into the proposed District Plan.*

9. APPENDIX 1. SUMMARY OF CHANGES AND HEARING PANEL DECISION

Appendix 1 outlines the submissions points and the Hearing Panel decisions and reasons, in respect of each point. The draft GMS will be amended as necessary to reflect the decision made by the Hearing Panel where submissions have been accepted or accepted in part.

Date : 10 April 2018

Signed:



Bill Wasley
Hearing Panel Chair



Mayor Damon Odey
Member



Councillor Paddy O'Reilly
Member



Councillor Kerry Stevens
Member

Appendix 1. Hearing Panel Decisions & Reasons

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
1	S Wolczuk	Town Growth	S1.1	Would like Council to consider 50, 52 and 54 Hornbrook Street for residential use.	Sub 1.1. Reject. Approach is inconsistent with the Regional Policy Statement of avoiding development if hazard areas, given the Regional Council advice is that these areas are potentially subject to inundation.
			S1.2	Would like Council to consider Waitohi Road for future housing.	Sub 1.2 Reject. Waitohi Road is some distance from and therefore detached from the Urban Boundary. Therefore, a consolidated settlement pattern would not be achieved as envisaged by the CRPS.
		Strategic Directions	S1.1 / S1.2	Would like individual cases be looked at.	Sub 1.1 / 1.2. These were considered within the assessments undertaken by staff and consultants.
			S1.3	The growth in Temuka needs to utilise empty land available as well as expand outside the settlement boundaries.	Sub 1.3. Agreed. It is noted that capacity of supply exceeds projected long-term demand even with the utilisation of vacant (or zoned recreational) land.
2	L Burdon	Town Growth	2.1	Future residential growth to the south of Geraldine Township is against the northward market growth, is on high flood risk land that has poor drainage and is adding pressure on existing sewer system which is at capacity. Future residential growth should be focused on infill development, which is supported by Councils report provided in the past years. Would like to discuss with Council about own land at 73 Connolly Street, Geraldine.	Sub 2.1. Accept in part. There is a need for infill development and to avoid hazard risk such as flooding but noting that the specific requests contained in the submission are rejected as noted below. Reject in part. The site would not promote a co-ordinated pattern of development as required by the CRPS and the site is subject to inundation. In addition, the Orari Road area is considered more appropriate for residential development
			2.2	Disagree with new industrial site on Tiplady Road.	Sub 2.2. Reject. Given there is only 1.19ha of zoned and available Industrial land in Geraldine to meet localised demand, the rezoning of the Tiplady Road area for industrial purposes is considered appropriate.
			2.3	Do not like the existing dispersal of lifestyle blocks in Geraldine.	Sub 2.3 Accept. Manage Rural Residential supply to achieve a consolidation approach.
				Deferred land has merit. Defines future development without restricting current uses of the land. Strategy might go some way to addressing long term development.	
3	CBD Investment and Strategy Group	Town Growth	-	No Comment.	
		Strategic Directions	3.1	The predicted growth is very conservative.	Sub 3.1 Reject. The approach applied utilises the most up to date Medium Growth Statistics NZ Projections. Regular monitoring will be undertaken to maintain awareness of population growth and land uptake.
			3.1		
			3.2	Enjoyment of amenities and natural assets has to be the highest priority for the transport direction.	Sub 3.2. Reject. The submission relates to the road corridor within the roading hierarchy and any amenity improvements will be subservient to the functional purpose of the network. The Government Policy Statement and Canterbury Land Transport Plan are overarching statements and plans for the setting of transport and roading priorities
			3.3	Considers there is a lack of infrastructure.	Sub 3.3 Reject. The matters raised are more appropriately addressed in terms of the Council's functions and day to day operations associated with the LGA, Infrastructure Strategy and the LTP There is an oversupply of sustainable floorspace to meet demand in the medium term out to 2028 and this is further detailed in section 5 of the Consultation Summary and Officers Recommendation report dated November 2017.
			-	No comment.	
			-	No Comment.	

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
4	H Larsen	Town Growth	4.1	Concerned there is no provision for additional commercial and industrial uses in Timaru. Commercial opportunities are the key of growth in employment market, the lack of commercial / industrial land may result in loss of business development opportunities and investors. Need to have a mix of property sizes within the main residential area to allow a bigger garden or chooks, instead of needing to buy several acres of land.	Sub 4.1 Reject. At a district level the industrial market is not constrained and there is an oversupply of sustainable floor space to meet commercial demands.
			4.2	There is the need to provide a variety of land sizes, including rural residential sized land. High density developments are for the larger cities while people settle down in small townships for larger blocks of properties. Land adjacent to the Tamitahu Stream, including 50, 52 & 54 Hornbook Street, Temuka is zoned in recreation with limited use. Such land is available and is suitable for future residential development.	Sub 4.2 Accept in part. There is a need to provide for rural residential development throughout the District at defined locations. Reject in part. The sites have unacceptable risk of natural hazards occurring and is contrary to Strategic Direction 4, of the GMS.
		Strategic Directions	-	No Comment.	
			4.3	Would like to see more art works in public places.	Sub 4.3 Noted. This matter is too specific for GMS and can be considered by the Council through other processes.
			4.4	The District is dominated by big players. More work need to be done to attract smaller investors to bring variety of business to our District. The District is too tough for small business to survive.	Sub 4.4 Reject. There is more than sufficient industrial zoned land both at the macro district level to meet the 10 year and longer term 30- year demand, as outlined in the Property Economics report.
			4.5	Roading status in Temuka are not good with road damage on main road and intersections. Better roading formation is needed to avoid damage.	Sub 4.3 Reject. This matter is too specific for GMS and is more appropriately considered through other Council processes.
			-	No Comment.	
			4.6	There needs to be a greater level of transparency with Council and clients. In particular how much a consent costs and why it was granted should be made public information for a fair play.	Sub 4.6. Reject. This issue relates to transparency in terms of Building and RC fees and charges and is not part of the GMS.
		Economic Growth		Would like to see a Regional Economic Development Forum developed to look at how the region will create an environment that attracts investments. Lessons can be learnt from other successful regions.	Submission noted. The matter falls outside of the GMS. However, there is an established Regional Economic Development Strategy that was developed through the Canterbury Mayoral Forum. In addition, the Council CCO Aoraki Developments is actively looking at economic development opportunities.
5	Timaru District Holdings Limited	Town Growth	5.1	Does not envisage the Showground site be used exclusively for large scale retail. It envisages light industrial use would be suitable given the location, accessibility and servicing capability. The site is ideal for industrial and commercial activities. There is significant demand for industrial land at the port and supply is limited. The Showgrounds site could be used to meet some of this demand.	Sub 5.1. Accept in Part. There is some opportunity in being able to accommodate compatible lighter industrial uses within the showgrounds site. However, given the recommendations from Property Economics such industrial activities should not reduce capacity to meet long term projected retail demand, or generate reverse sensitivity effects on the primary public retail purpose of the Commercial 2A zone. Accordingly, the options for the replacement District Plan to consider in achieving such an outcome are to: 1. Amend the operative ODP within the replacement District Plan to provide for Industrial opportunities in a limited area not exceeding 5ha; 2. Amend the status in the replacement District Plan from non-complying to restricted discretionary for Industrial activities but limiting such activities where these would result in substantial up-take of land or result in reverse sensitivity effects. 3. Permit wholesale, warehouse and distribution activities with additional urban design and amenity requirements.

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
		Strategic Directions	5.2	Supports the Sustainable Economy Directives outlined on page 54 of the Strategy.	Sub 5.2 Accept.
6	M Thompson	Town Growth	6.1	Agree in principle with the demand for residential expansion and the consolidation approach in Town centre.	Sub 6.1 Accept.
			6.2	Disagree with approach to Industrial Land. The expected even out of population by 2031 does not equal to the trend of industrial demand. Industrial growth is expected, and industrial land should be prepared and readily serviced to accommodate the market demand to attract businesses to the District.	Sub 6.2 Reject: For the Timaru District, as outlined by Property Economics report there is more than sufficient zoned Industrial land, at the macro district level to meet the 10- year (medium term) and 30- year (long term) demand. At a District level, the Industrial market is not constrained. However, the situation will be monitored, and the GMS regularly reviewed
			6.3	Strongly agree with approach in Residential growth.	Sub 6.3. Acknowledged.
			6.4	Agree with a light industrial area identified away from residential area. Services in the new industrial area need to be carefully considered.	Sub 6.4 Reject. It is considered that specific tourism operations are more suited to consideration through a consent process than spot zoning. The North West Geraldine Area is prone to flooding. Tiplady Road area is a preferred location for industrial land development near Geraldine.
				Consider Vance Road is suitable for Transport type business given the location, soil type, and existing land use.	
				The area of land North West Geraldine currently zoned Rural2 between the Waihi River and the State Highway 72 up to Bennett Road / Woodbury Road intersection is on busy tourist route and the area is suitable for tourism related activities.	
			-	No Comment.	
			-		
		Strategic Directions	-	No Comment.	
			-		
			-		
			6.5	Retirement village typed land use need to be provided to accommodate the aging population.	Sub 6.5. Acknowledged. The GMS promotes this type of housing choice.
			6.6	Economy is essential for our District. Need to use our available resources wisely, such as water use.	Sub 6.6. Acknowledged.
			6.7	Would be great to provide an alternative route through smaller towns for large trucks to avoid disturbance and keep businesses vibrant for locals and tourists alike. Perhaps a bypass via Orari Back Road.	Sub 6.7. Reject. Transport routes and any alternative freight routes are considered by relevant agencies such as the NZTA and Council, and therefore not a matter for inclusion in the GMS
			6.8	A blend of services and recreation is prudent.	Sub 6.8. Acknowledged.
			6.9	Consultation with Runanga needs to take place as part of the process but should not add another layer of cost and compliance for landowners / business owners.	Sub 6.9. Accept in part. Part of the Councils regulatory function is that processes and regulation are efficient and effective.
			-	No Comment.	
7	CA Eggeling	Town Growth	7.1	Do not think rural land north of Pages Road should be developed until all land within the town boundary has been built on.	Sub 7.1 Accept in Part. Rural Residential zoning is important to provide for that segment of the Market. Rural residential living has a different purpose to more intensive residential in terms of diversity of living environments.
			7.2	Would like to see Town Planning to adjust existing town concept plans for roaming layout to better enhance future development especially with the continuation of Dobson Street in Timaru.	Sub 7.2 This matter is too specific for the GMS and can be considered through other Council processes.

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
		Strategic Directions	7.3	Agree because Timaru is expanding at a great speed. Own development at Hunter Hills Drive and other recent developments proved this. Commend the Council for what they are trying to achieve.	Sub 7.3. Acknowledged.
		Transport	7.4	Would like to see the 50kph zone decreased on Pages Road, Timaru from 254 Pages Road through to 377-383 Pages Road due to the danger of an pending accident.	Sub 7.4 Reject. This is a matter for the Transport Unit of Council to consider and not a GMS matter as too specific.
			7.5	Would like the kerb and channel be established on Pages Road, Timaru to the area of 377-383 Pages Road especially on the town side of the road.	Sub 7.5 Reject This is a matter for the Council's Infrastructure Unit to consider and not GMS matter as too specific.
8	K Beck	Town Growth	8.1	<p>Rural Residential must be considered to avoid urban sprawl. It is recommended to limit Rural Residential sizes between 0.4ha to 0.6ha. Properties of this size would have scope to develop an orchard, bee hives, a livestock paddock or market gardening.</p> <p>Provision of native planting, including planting along right of ways should also be considered.</p>	Sub 8.1 Reject. Lot size is critical determinant of character and amenity. 0.5 to 1ha generally seen as appropriate Industry standard. Having a band of 0.4 to 0.6 would be too constraining and starting to develop a more urban environment (and more manicured outlook).
9	I Geary	Administration	9.1	There is lack on how any corruption is to be anticipated, assessed, audited or mitigated against in the process. To address this deficiency, Council has to acknowledge the potential of corrupt practices in the process, extensively research the areas and remedy actions to take place to reduce corrupt practices. The Council itself could be tainted and uses contradictory practices that may fall into the definition of corruption.	Sub 9.1. Reject. The LGA sets out a process around transparency of decision making. All records for the preparation of the GMS including background reports have been consulted on. No evidence of any corruption in preparation of the GMS has been apparent
10	F Ross	Town Growth	10.1	<p>Generally agree.</p> <p>Within the proposed Rural Residential development at Kelland Heights, there area at least two areas that contain natural values within or nearby. One is the Kellands Hill natural carex wetland in a natural gully west of the road, the other is further up this gully, below the Mt View Village. If these two areas fall within the Rural Residential areas, these natural features should be retained and maintained.</p> <p>Consideration should also be given to maintaining the excellent far reaching views that can be seen from both Kelland Hill Road and Pages Road.</p> <p>Some areas, for example the south end, that contain many older dwellings could be an area for renewal of housing.</p>	Sub 10.1 Accept in Part. It is important that these areas are considered in terms of (a) their statutory relevance, and (b) if important they are appropriately identified and incorporated within the subsequent ODP process for this area to be incorporated in the District Plan. In relation to older dwellings it will be up to the market / owners as to the desire for retention, unless of heritage importance TDC cannot require retention.

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
			10.2	Generally agree. The natural values of native trees on Downs need to be retained and protected from development - if not already done so.	Sub 10.2 The significance of these trees needs to be considered in terms of a notation in the District Plan. If not notable, but of high amenity / character value then they need to be considered as a defining characteristic for any outline plan in respect of Rural Residential development.
			-	No Comment.	
			10.3	The existing walkways and cycling tracks be extended, where possible, and not crowded out by building developments.	Sub 10.3. Acknowledged and to be considered in terms of internal setbacks from buildings in the District Plan.
			10.4	Generally agree the rural residential development should be more targeted to prevent rural sprawl. Not to provide rural subdivisions near or within significant natural areas as of right. Buffer zone or protection as should be placed around such areas to protect them.	Sub 10.4 Accept. Setbacks to significant natural areas are to be considered as part of the Outline Development Plan process.
		Strategic Directions	10.5	Generally agree with intensions of the directions and agree they are important matters to consider.	Sub 10.5. This submission point is acknowledged.
			10.6	Landscapes and natural features and production land need to be retained and protected from developments.	Sub 10.6. Acknowledged. Agreed the matters will be updated through the District Plan process
			10.7	Existing settlements and urban form be retained and urge new buildings to blend in with existing patterns. Holiday homes need to be limited to those existing already.	Sub 10.7. It is agreed that urban design is important and is to be considered in Commercial, Industrial and Residential District Plan built form standards. Council is unable to limit the extent of holiday homes.
			10.8	Business development and economy is important and should be promoted by Council.	Sub 10.8 It is agreed that diversity and enablement is important.
			10.9	Should encourage people to use the existing public transport system.	Sub 10.9 Accept. In line with the Transport Directive, promoting alternative transport nodes is an important focus.
			10.10	Very important to keep the open spaces to retain the views to outstanding landscapes in the District.	Sub 10.10 Acknowledged. Landscape analysis through the District Plan will be used to identify the main landscape vistas. For new Rural Residential areas this will likely be a matter for consideration in the preparation of Outline Development Plans. For existing urban areas, it will be impossible to retrofit such vistas.
			10.11	Climate change and how it will affect coastal area need to be considered.	Sub 10.11. Acknowledged. These matters are prescriptively set out in the CRPS and the District Plan is required to give effect to any such requirements
11	H Frank	Town Growth	11.1	Need to provide appropriate infrastructure to support higher density developments.	Sub 11.1 Accept. It is acknowledged there is a need to ensure infrastructure supports intensification.
			-	No Comment.	
			-		
			11.2	Should still enable options outside the identified area where justifiable.	Sub 11.2. Accept in part. The CRPS seeks to discourage dispersed Rural Residential. The District Plan will not prohibit these activities in the rural zone and will allow for consideration based on merits. However, the GMS seeks to identify the best areas for growth to occur.
		Strategic Directions		No Comment.	

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
			11.3	Strongly agree with these directions.	Sub 11.3. The submission point in support is acknowledged .
				Strongly agree with this direction, in particular "(i) recognise and protect outstanding natural landscapes and natural areas in the district from inappropriate activities".	Sub 11.4. Acknowledged.
			11.4	Depends on how this happens.	Sub 11.4. Acknowledged. Consultation with Iwi and understanding community building and statutory requirements.
			11.5	Support the statement "as efficiently and effectively serviced by supporting infrastructure".	Sub 11.5. Submission noted.
			11.6	More emphasis should be given to use more environmentally friendly transport e.g. rail, boat.	Sub 11.6. Submission noted.
			-	No Comment.	
			11.7	Strongly agree, especially support "maintain or enhance areas or features of cultural, historical, landscape or ecological value"	Sub 11.7. Acknowledged. These areas are to be identified and consulted on through the District Plan process.
			11.8	Might include NGOs.	Sub 11.8. The submission point is noted. The requirement to consult with NGO's will be issue specific.
			11.9	Where the benefits are clearly related to one group, it should be reflected in the costs for this group. However, some costs cannot be allocated directly and will benefit the wider community.	Sub 11.9. The submission point is noted .
		Infrastructure	11.10	More consideration needs to be given to water quality e.g. through storm water and seek ways to minimise impact on water quality.	Sub 11.10 Accept. This matter is already being considered as part of the Infrastructure Strategy.
12	T Titheridge	Town Growth	12.1	Would endorse a modest increase in housing density. However, to accommodate the projected increase, infrastructure, amenities and business centres need to be looked at as suburbs on the outer suburbs of town grow and develop.	Sub 12.1 Accept. There is a need to ensure that infrastructure matches growth in the outer suburbs.
			12.2	Do not agree the proposed light industrial zone on Tiplady Road due to conflicts between residential and light industrial use, as well as the traffic hazard at the Coach Road intersection.	Sub 12.2 Reject. Limited industrial land in Geraldine is being provided to meet localised demand, and the Tiplady Road site is not adjacent to any residentially zoned land and is in proximity to the town and services.
			-	No Comment.	
		Strategic Directions	12.3	The strategy is needed for future growth of Timaru, however, it did not look at the big picture. Do not want to see future development in Washdyke along the sea due to sea level rise.	Sub 12.3. Acknowledged. Washdyke already zoned. MfE Guidance on sea level rise and inclusion in District Plan may reduce any developable area. Submissions seeking expansion at Washdyke in coastal margin have been declined.
			12.4	Heritage should be retained and restored as much as possible. Earthquake prone alone is not a justifiable reason to demolish a heritage building.	Sub 12.4. Accept in part. Criteria for demolition will be considered in the District Plan review, however the economics of restoration of earthquake prone heritage buildings cannot be ignored and are challenging.
			12.5	As long as sufficient green spaces are provided for and urban planning will cope to demands.	Sub 12.5. Acknowledged. The Timaru District Council Parks Strategy (2012 – 2022) considers and manages this matter.
			-	No Comment.	

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			12.6	Encouragement of cycle lanes, walking buses, green spaces and trees are accounted for.	Sub 12.6. Submission assumed to be based on need for amenity in terms of business growth and diversity. Standards will be required through the District Plan provisions.
			12.7	To encourage cargo movements by rail.	Sub 12.7 The mode used for cargo movement is facilitated by demand and KiwiRail. This is a matter beyond Councils direct influence.
			12.8	Ensuring light industrial and residential are not located close to one another.	Sub 12.8. Accept in part. Apart from the Tiplady Road area, no new Industrial zones are proposed to be established. It will be important to manage nuisance issues at the interface through District Plan provisions
			12.9	Ensuring parks and reserves are looked after and are not developed for residential or commercial uses.	Sub 12.9 Accept. It is noted that no rezoning is proposed of any parks and reserves.
			12.10	Engagement with community is needed.	Sub 12.10 Acknowledged. Strategic Direction 12 seeks to enhance consultation, community engagement and transparency. Preparation of the GMS for example involved the provision for drop in sessions and a submission process, and targeted engagement.
			12.11	Ensure Timaru is an age friendly centre, in accordance to World Health Organisation.	Sub 12.11. Acknowledged. Part of the focus of the GMS is recognising and providing for the needs of an increasingly aging population.
		Administration	12.12	Keep rates low in Geraldine.	Sub 12.12. Noted. This issue is a focus for the Long- Term Plan. However, the GMS seeks to make the most efficient use of infrastructure to assist in reducing the need for increased expenditure.
13	L Robertson	Town Growth	13.1	Support the rezoning in Kellands Heights, Gleniti North and Elloughton South areas from Rural to Rural Residential as: - The land is already in use as lifestyle blocks. This will avoid dispersion of lifestyle blocks into production land. - The rezone will provide housing options with manageable lifestyle blocks which is currently lacking. - Infrastructure and schools are readily available in this area. Suggestions to overcome potential adverse effects: - Restrictions to protect views of existing residents in the area. - Restrictions for noise emission above normal living noise to avoid reverse sensitivity.	13.1 Accept. There is a need to manage Rural Residential supply to not undermine the consolidation approach outlined in the GMS. Issues around views and noise levels will require a combination of zone standards for the RR zone with regard to open space, density and noise levels, and potentially requirements in the ODP for major viewshafts.
14	SD Barclay	Town Growth	-	No Comment.	
			14.1	Further to the proposed locations, Hornbrook Street and Hayhurst Street are zoned Recreation and currently appear to be waste land which are suitable for future residential use. Flood risk on these properties should have been removed with flood protection works carried out in recent years.	Sub 14.1 Reject. Sites are subject to natural hazards.
			14.2	Generally agree with the direction but should rezone and utilize existing vacant land first.	Sub 14.2 Accept. There is a need to manage Rural Residential supply to not undermine the consolidation approach outlined in the GMS.
		Strategic Directions	-	No Comment.	
			-		
			14.3	Should firstly utilise existing vacant land before further encroachment into rural land.	Sub 14.3. Acknowledged.
			14.4	The difficulty of providing sewerage can be overcome by the use of step systems or maceration pumps without major mains.	Sub 14.4 Reject. The submission is more appropriately addressed in terms of the Council's functions and day to day operations associated with the LGA.

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			14.5	Disagree with the urban encroachment on prime rural farm land.	Sub 14.5. Accept in part. Residential zoning is required to provide for projected growth. This is a key element of the CRPS, but many factors need to be considered. Where farm land is required for residential use, intensive residential development is proposed to make the best and efficient use of the land			
			14.6	The reserves, parkland and walkways in Temuka are a wonderful asset.	Sub 14.6. Acknowledged.			
15	I & A Pierce	Town Growth	15.1	The proposed Kellands Heights rural residential area may impact the submitter's property as it adjoins three out of their four property boundaries. However, the submitter does not anticipate any serious impact and is therefore adopting a neutral position in regard to the rezone.	Sub 15.1 There will be a need to ensure that the interface with existing areas is respected in terms of ODP preparation. Accept. There is a need to manage Rural Residential supply to not undermine the consolidation approach.			
16	BJ & JEM O'Keefe, DG & ML Earl, and J Howard & S Nichelsen	Town Growth	16.1	The proposed development does not take account the need for housing development in Woodbury. The submitters request the rezoning of Rural 1 to Rural Residential at 16 – 36 Burdon Road, 42 Burdon Road, and 568 Woodbury Road, Woodbury for the following reasons: - Any further development on the land can be easily serviced with on-site wastewater disposal and water supply. - The area is already serviced with garbage collection. - Council would benefit from a greater rate intake. - Development here will attract more people and will meet the Vision statement “A district where land use and growth is sustainably managed to ensure a fantastic lifestyle, thriving economy and strong identity.” - There are existing amenity, community facilities, schools in Woodbury. - It is a desirable area for lifestyle blocks with market demand pressure. - The existing blocks are too small to farm economically but too big for rural residential.	Sub 16.1. Accept. It is considered appropriate for Woodbury to provide for as a Rural Residential zone location, for the area outlined by the submissions. It is considered that it would provide for a range of housing opportunities that are supported by local and community facilities. The area adjoins the existing residential zoning so therefore it meets the criteria for the consolidated approach outlined in the GMS and giving effect to the relevant provisions of the CRPS			
				Strategic Directions		16.2	Do not agree with intensification of housing in town centres.	Sub 16.2. Reject. Intensification in and around town centres achieves coordinated development and provides housing choice.
						16.3	Agree with these directions as rural residential development in Woodbury will meet the intentions of these directions.	Sub 16.3, 16.4 and 16.5. Accept support for Directions, and accept Woodbury as a Rural Residential zone location, for the area outlined by the submissions. It is considered that it would provide for rural residential housing opportunities that are supported by local and community facilities. The area adjoins the existing residential zoning so therefore it meets the criteria for the consolidated approach.
						16.4	Didn't consider Woodbury.	
						16.5	Woodbury meets the intensions of these directions.	
			16.6	Agree there is an increase of aging group and consider these are to be adequately dealt with by the McKenzie Village development.	Sub 16.6. Submission noted.			
		17	GA Morton Family Trust, and GA & SA Morton	Town Growth	17.1	There is strong demand for Rural Residential land close to town. Current Rural Zone is restrictive and does not taking into account the contour, views etc at times of subdivision. Strongly agree particular in regard to Rural Residential developments at 427 & 509 Pages Road, Timaru for the following reasons:	Sub 17.1 Accept in part It is noted that there is a need to manage Rural Residential supply to not undermine consolidation approach. Therefore, it is considered that the land outlined in the submission is adjacent to the Kellands Heights rural residential area and therefore supports the consolidation approach. It is in close proximity to urban services and amenity and is bookended by the golf course and a gully to the north.	

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		Strategic Directions	17.2	<ul style="list-style-type: none"> - Will meet the market demand for opportunity of lifestyle blocks between 3,000sqm to 2ha with views. - Topography of land could form a natural boundary between Rural Zone and Rural Residential Zones. - The land is easily accessible. - Future developments on the land can be easily serviced by water and telecommunication. - The location of the land is close to essential services and amenities. - The land is currently used for grazing as a dairy support unit and cannot be used for intensive cultivation due to the lack of available irrigation. 	<p>Reject in part. The minimum size for rural residential lots is 5000m2 which is a district wide requirement and is related in part to onsite provision of services. It is not considered appropriate to have lots that are below this minimum.</p> <p>It is noted that the subject area was previously outlined for future growth and a legal road (unformed) is in place to assist with the provision of road access.</p>
18	Rolling Ridges Trust, Russel & Pages Trust, and Simstra Family Trust	Town Growth	18.1	<p>The extension of Residential Zone on the northern side of Pages Road, Timaru, west of the current zone boundary is not discussed. Rezoning a 50m strip along Pages Road at Lot 3 DP 397906 and 279 & 295 Pages Road, Timaru to Residential 6 is sought for the following reasons:</p> <ul style="list-style-type: none"> - It provides a transactional zone between Residential 1 and Rural Residential. - The land was zoned Future Urban Development prior to the amalgamation in local government and rezoned to Rural without consulting the landowners. - The land adjoins the existing settlement areas and in close proximity to amenities, recent residential developments, schools and a retirement village. - There is strong market demand for residential properties in this area. - Future development on the land can be easily serviced with existing infrastructure. <p>Note. We received correspondence dated 5 December 2018 (tabled and provided to the Hearing Panel at the hearing on 56 December 2018) from counsel acting for the submitters stating that the submitters supported the rural residential zoning proposed for their properties and did not wish to pursue the residential zoning outlined in their submission.</p>	<p>Sub18.1 Support noted. Correspondence outlining support for the rural residential zoning was provided to the hearing Panel at the hearing. Given this situation and noting that the relief sought had changed from seeking a residential zoning to one of supporting the rural residential zoning, we have not considered the residential zoning request any further given the request for it had been withdrawn.</p>
			18.2	<p>Would like to see the 80kph zone decreased to 50kph on Pages Road, Timaru where residential use is due to the danger of an accident at the intersection of Hunter Hills Drive.</p>	<p>Sub 18.2 Noted. This is not a GMS issue, but is to be considered by the Council Transport Unit.</p>
			18.3	<p>With regard to the predicted growth:</p> <ul style="list-style-type: none"> - Residential sales since 2013 has significantly exceeded growth predicted in the Strategy. - It is wrong to conclude that no additional residential land is required for Timaru. The District Plan need to be flexible to accommodate future growth potentials. 	<p>Sub 18.3 Reject. NPS-UDC Basis for utilising the NZ Statistics Projections. Growth rates based on the updated 2013 base data are recommended. Accept in Part. Given current level of capacity in Timaru some additional modest capacity is required.</p>
			18.4	<p>Support the Rural Residential Zone and it should recognise the need for a strip of land on the north side of Pages Road, Timaru for residential use.</p> <p>Note. We received correspondence dated 5 December 2018 (tabled and provided to the Hearing Panel at the hearing on 56 December 2018) from counsel acting for the submitters stating that the submitters supported the rural residential zoning proposed for their properties and did not wish to pursue the residential zoning outlined in their submission.</p>	<p>Sub 18.4 Support noted. Correspondence outlining support for the rural residential zoning was provided to the hearing Panel at the hearing. Given this situation and noting that the relief sought had changed from seeking a residential zoning to one of supporting the rural residential zoning, we have not considered the residential zoning request any further given the request for it had been withdrawn.</p>

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19	C Wright	Town Growth	-	No Comment.	
			19.1	The land to the south of Taumatakahu Stream was rezoned from Rural Residential to recreation. It may now be rezoned back.	Sub 19.1 Reject. Sites are subject to natural hazards, and the proposal is contrary to CRPS and the Strategic Direction.
		Strategic Directions	-	No Comment.	
20	Canterbury Regional Council	Town Growth	20.1	Strong agrees with the more focus approach to rural residential development	Sub 20.1 Accept. Submission seek a targeted zoned approach to rural residential development.
		Strategic Directions	20.2	Agrees with overall direction and commends Council for the process and endorses the Strategy. Supports move to more active approach. Overall the Strategy gives effect to the Regional Policy Statement.	Sub 20.2 Accept submissions and support for the strategic direction is noted.
			20.3	Agrees with the approach to infrastructure. Would like more recognition to address the current and future environmental issues when planning for infrastructure. Accordingly, requests Infrastructure Directive 6 on page 58 of the Strategy to be reworded. Refer to original submission for requested wording.	Sub 20.3 Accept in Part. It is considered that Directive 6 requires some further clarification in respect of infrastructure renewal contributing to improved environmental outcome. <i>Directive 6. Manage the adverse effects from infrastructure on the environment, including avoiding further such adverse effects on significant natural and cultural values where practicable; and when renewing infrastructure or designing new infrastructure maintain, and where appropriate enhance the overall natural environment having regard to the efficiency and effectiveness of infrastructure renewal or design.</i>
21	Insights Consultancy	Town Growth	21.1	The growth in Geraldine area is underestimated as confirmed in correspondence with Statistics New Zealand. As this is the case, the identified future residential growth in Geraldine will be inadequate.	Sub 21.1. Reject. The updated Statistics NZ Projections Update 2017 indicates that there would be a medium- term shortfall of 12 dwellings and a long- term deficit of 77 dwellings. To address this situation, we recommend additional land to be identified in the GMS for residential purposes. This together with an expanded deferred zone and regular monitoring and review will assist in addressing any projected shortfall.
			-	No Comment.	
		Strategic Directions	21.2	Seeking full infrastructure costs recovery from developers will compromise development economics. Council will need to adopt a more proactive approach to bring more public sector funding to co-invest and finance initial costs of infrastructure trunk expansion.	Sub 21.2 Reject. Development is to pay for development and the Council to advise on the appropriate amount through financial contributions policy.
			-	No Comment.	
			21.3	What if land owners do not make the land available? Alternatives need to be prepared should this be the case to release land for future growth.	Sub 21.3 Accept in part. Council cannot compel a landowner to develop as this will come down to their preferences and the market. Furthermore, the hearing panel has accepted submissions to provide for residential development. However, Council cannot over supply and provide infrastructure as this would be inefficient. At present, in the residential sector there is a sufficient supply of land and multiple landowners so that the risk of this approach appears low.
			21.4	Needs to be a more explicit focus / partnership approach upon facilitating development into areas that are in accordance with the Strategy.	Sub 21.4. Accept in part. The Council approach is to assist with ODP preparation for Rural Residential and assist with comprehensive developments (through public realm

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					improvements) for higher density residential. Issues as to infrastructure costs (DCs/FCs) and getting that balance correct will always be contentious.
			21.5	Population assumptions are flawed. Population likely to grow more strongly than forecast.	Sub 21.5 Reject. Use of NZS Projections is considered appropriate, acknowledging updated projections for use in GMS, and no alternative projections have been provided.
22	N Gilkison	Town Growth	22.1	Agree with the approach. However, the Strategy is targeted for a long time period. It should also look at other potential areas of residential and business growth should the growth be greater than current forecasts.	Sub 22.1 Accept in part. GMS includes monitoring clauses to be responsive should growth projections change. No evidence has been provided regarding a projection model for the whole of Timaru District and it is inappropriate to have different projections for different parts of the District.
			-	No Comment.	
			-		
		Strategic Directions	22.1	Support the consolidation of existing settlement areas where existing facilities and infrastructures are located. However, the Strategy should consider options in the circumstances that if growth is underestimated or overestimated.	Sub 22.1 Accept in part. GMS includes monitoring clauses to be responsive should growth projections change.
			22.2	Retention of important heritage buildings should also be a priority.	Sub 22.2 Accept in part. Heritage retention will be a specific requirement under the RMA and District Plan. However, this will not mean retaining heritage at all costs.
			22.3	In addition, there should be a focus on identifying, cleaning up and managing degraded natural habitats.	Sub 12.3. Acknowledged. Both regulatory and non-regulatory will need to be considered. There is also a mandate in the Canterbury Regional Plans to promote restoration.
			22.4	The Strategy should also consider where to accommodate potential growth which exceeds the forecasted level.	Sub 22.4 Agreed. The Options assessment has been completed which identifies additional areas should these become appropriate. The GMS will be regularly reviewed growth to allow additional areas if required.
			22.5	The Strategy should also look at resilience to man-made hazards e.g. climate change, degradation of natural environment by man.	Sub 22.5. Agreed, which is why this forms a Strategic Direction. The focus in DP provisions will also be on Natural Hazards and new requirements in CRPS and MfE re Sea Level Rise.
			-	No Comment.	
			-		
			22.6	To be sustainable, it is critical that the natural environment is not adversely impacted by developments.	Sub 22.6. Acknowledge. Approach of the GMS will be focused on the relevant statutory requirements, chiefly the RMA and Sustainable Management, requires a balance between enablement and mitigation, Section 6 Matters for Natural Environment and Bottle lines do have some primacy.
			22.4 22.7	The Strategy should also consider how to handle potential growth which exceeds the forecasted level. Should consider future public transport and promote greater use of them.	Sub 22.4 & 22.7. Acknowledged. Public transport provision is beyond the scope of the GMS.
			22.6	In addition, all development should be environmentally, economically and socially sustainable.	Sub 22.6. Acknowledged.
			22.8	The promotion of mixed use, walkable neighbourhood is a key element.	Sub 22.8. Accept Will be the focus in Residential Intensification Areas, difficult to achieve given static growth and much of the residential stock to 2048 is already in place - retrofitting difficult.
			22.9	Also need to ensure the function and quality of open spaces are key design elements.	Sub 22.9. Acknowledged In addition, the Timaru District Council Parks Strategy (2012 – 2022) manages this matter.
			22.10	More and better pro-active consultation and engagement with key stakeholders is required.	Sub 22.10. Reject. The Consultation Summary and Officer Recommendations report dated 2017 outlined the consultation undertaken by the Council in respect of development of the GMS. This included both targeted and general consultation phases. The draft GMS was open for a 4- week period for submissions which was subsequently extended upon request to 6 weeks. Consultation and engagement included the release of an issues and options

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					paper for public feedback; engagement with targeted stakeholders on a preliminary GMS, drop-in sessions; and public consultation through a submission process.
			22.11	There has not been enough engagement with the public and key stakeholders in the drafting process. Further pro-active consultation and engagement directly with the public and key stakeholders is required in the process.	Sub 22.11. Reject. The Consultation Summary and Officer Recommendations report dated 2017 outlined the consultation undertaken by the Council in respect of development of the GMS. This included both targeted and general consultation phases. The draft GMS was open for a 4- week period for submissions, which was subsequently extended upon request to six weeks. Consultation and engagement included the release of an issues and options paper for public feedback; engagement with targeted stakeholders on a preliminary GMS, drop-in sessions; and public consultation through a submission process.
23	P Brown	Town Growth	23.1	The recreation land that borders the Tuamatakahu Stream should be rezoned residential to reflect the current use as they contain houses.	Sub 23.1 Reject. Sites are subject to natural hazards and development in such area is unacceptable.
			-		
		Strategic Directions	-	No Comment.	
24	Seadown Properties Limited	Town Growth	24.1	The submitter requested Lot 6 DP 578 be rezoned from Rural to Light Industrial in two stages for the following reasons: - The Options Report has rated 'Laughton area' with the highest rating for Industrial Growth Options in Washdyke. - The Options Report concluded that no additional industrial land is required due to the available land in Washdyke area. However, it did not take into account that existing land owners are land banking and not willing to develop the land. Therefore, there is actually a lack of industrial land available on the market.	24.1 Accept. The site not a flood risk, in accordance with the CRPS. The land is proposed to be rezoned for industrial purposes, but an ODP should be a requirement to provide wider integration given it is intended that the adjoining Shaw, Fraser and Johnston property is to be rezoned and integrated for similar purposes.
25	South Canterbury Federated Farmers of New Zealand	Town Growth	25.1	Strongly agree with the predicted residential demand and modest increase in housing density over the next 30 years. In particular, consider the Strategy has provided adequate allowance to accommodate demand for rural lifestyle residences. The changing to aging population suggests that there will be a greater demand for smaller low-maintenance properties which are closer to services.	25.1 Accept. It is considered that rural residential development has been adequately provided for by the GMS.
			25.2	Agree with the predicted residential demand and modest increase in housing density over the next 30 years. In particular, consider the Strategy has provided adequate allowance to accommodate demand for rural lifestyle residences. The changing to aging population suggests that there will be a greater demand for smaller low-maintenance properties which are closer to services.	25.2 Accept. An aging population, and the composition of households to also likely change, with a proportional decrease in 'family households' and an increase in 'one-person households' ⁸ which decreases proportional demand for space extensive rural residential properties.
				However, have some reservations if the change in zoning from Rural 2 to Residential were to proceed on productive land on Orari Station Road, Geraldine.	Sub 25.2 Accept in part. This area came out as preferred in Options Assessment. The intensive development of residential land is intended to constrain use of farm land for residential purposes.

⁸ Growth Options Assessment. Section 1 – District Growth Assumptions. Figure 1.5: Natalie Jackson, University of Waikato.

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			25.3	Generally agree with the approach. However, question the need of proposed new Rural Residential at Manse Road given: - The overall size of the township and sections in town are generally larger than other urban centres. - There is sufficient vacant and large residential zoned allotments in the existing settlement area to accommodate the predicted residential growth to 2028.	Sub 25.3. Reject. Prudent to provide a Rural Residential zoned opportunity given likely market demand.
			25.4	Support the Direction for a more focussed approach to rural residential development, however, oppose in principle to the conversion of valuable productive land to other uses without very good reason.	20.1 Accept. A targeted zoned approach to rural residential development is an important focus of the GMS.
		Strategic Directions	25.5	Agree with the Directions overall and consider it is a pragmatic approach. The essential need for such pragmatism is the identification of an aging population for the District.	Sub 25.5 Agreed but focused approach replaces current dispersed exemptions approach - there is a need to demonstrate that the community demand for Rural Residential in the district can still be met.
			25.6	Strongly agree, in particular support "(iii) the retention of the character and productive capacity of rural areas".	Sub 25.6 Support Acknowledged
			25.7	Generally support the Direction, however, consider the provision of esplanade, in particular with access values, should include consultation with landowners over private land, unless over land that Council is taking full responsibility.	Sub 25.7. Accept. 'Rural Landholders' be inserted as a Support Agency for actions A2.1, A2.2, A2.3 and A2.4.
			25.8	Strongly agree with these Directions, in particular the minimum need of urban expansion.	Sub 25.8 Support Acknowledged.
			25.9	As a result of the change to aging population, an increasing number of the District's population will be on fixed income, any enforced expense over CPI rates (1.3% to the December 2016 year quarter) will not contribute to the building of resilient communities. This means that raise in property rates (56% nation-wide) is not going to support this Direction. Although it is a matter for the Long-term Plan to deal with, the submitter suggests a change to Direction 4(ii) to include building resilience is within the financial capacity of its citizens. Refer to original submission for requested wording.	Sub 25.9 Reject. This is an issue for consideration as part of the LTP process.
			25.10	Agree with these Directions.	Sub 25.10 Support Acknowledged
			25.11	This is somewhat repeating Directions 1 and 3. Also have concerns of the use of the word 'support', considering 'encourage' may be more appropriate.	Sub 25.11 Accept. Agree that ' <u>encourage</u> ' would be more appropriate given likely DP provisions and servicing.
			25.12	While recognise the importance of the Port and the importance of access to the port, access to the port via Timaru town has an adverse effect on the locals. This access need to be improved and should be singularly identified in Table 9, by conclusion in action 7.6.	Sub 25.12. Reject, Alternative port access investigations and improved public access to the waterfront are regularly considered by relevant Agencies including Council.

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			25.13	Agree that infrastructure is Council's responsibility. However, there are National Policies Statements demanding local community's responsibility to protect infrastructure and some national infrastructure operators sought to impose further restriction on local communities. The Strategy should indicate Council's willingness to fulfill its national obligations while, defending the rights of its own citizens. Infrastructure Directive 5 should be reworded to recognise this requirement. Refer to original submission for requested wording.	Sub 25.13. Reject. It does not align with National Policy Statement requirements.
			25.14	Strongly agree with the collaborative approach of this process and is willing to further participate in the process.	Sub 25.14. Support Noted.
			25.15	Agree with approaches (a) & (b) and disagree with approach (c). There are many controls imposed on selected sections of the community through the RMA and other legislations. It is the submitter's belief that the costs of any control imposed by a community on a single sector, should be paid for by that community. It is suggested that the words 'do not fall predominantly on the wider community' are deleted from C:2(3) of the Strategy.	Sub 25.15. Reject. This is a matter for consideration in an LTP process.
26	J Scott	Town Growth	26.1	Agree with the approach but considers that new Rural Residential zone adjoining Manse Road, as shown on public notice should follow land boundaries to include all the land between Manse Road, Smart Munro Road and a paper Road joining the two roads. As one of the landowners within the identified rural residential area, was not consulted. Pre consultation should take place prior to such a document was developed.	26.1 Reject. Growth Options and analysis undertaken by TDC considered this area. It is noted that the extent of Rural Residential supply would not require both sites. Consultation was undertaken. The Consultation Summary and Officer Recommendations report dated 2017 outlined the consultation undertaken by the Council in respect of development of the GMS. This included both targeted and general consultation phases. The draft GMS was open for a 4- week period for submissions which was subsequently extended upon request to 6 weeks. Consultation and engagement included the release of an issues and options paper for public feedback; engagement with targeted stakeholders on a preliminary GMS, drop-in sessions; and public consultation through a submission process. The submitter will be able to make submissions to the proposed District Plan when it is publicly notified
		Strategic Directions	-	No Comment.	
27	R Payne	Town Growth	27.1	Future growth in Orari is not addressed. The former railway land at Orari is no longer in private hands and should be promoted for light industrial use given: - It can be easily accessed. - It can be easily serviced with water, power, sewer. - It has the potential to provide any required car parks.	27.1 Reject. The Rezoning is neither attached to an existing urban area, nor would assist coordinated settlement patterns. There is no need for additional supply. The Tiplady Road area has been assessed as a better option for industrial land provision.
28	R Hay	Town Growth	-	No Comment.	

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			28.1	There is strong demand for rural lifestyle blocks in Pleasant Point. Submitter had to search two years to find the lifestyle block in Pleasant Point. 101 Te Ngawai Road, Pleasant Point is 1.8ha in area, zoned Rural but not financially viable to be run as a rural unit. It adjoins a residential development where sections were sold and developed very fast. It is a very popular area for new homes / families.	Sub 28.1. Accept in part. The GMS provides for rural residential demand near Pleasant Point at the Manse Road location. Reject in part. Area adjoins existing urban area to south east and has direct access to Te Ngawai Road. Issues of flooding and intensification to be considered firstly. This would also create a spot Rural Residential zone, although current size and likely activities would be more RR in nature.
			28.2	The ability for families to have a lifestyle property is essential for rural communities. The submitter thoroughly encourages the provision of lifestyle blocks.	Sub 28.2 Agree in part. There is a need to manage Rural Residential supply to not undermine consolidation approach and to provide for opportunities.
			28.2	Development of additional good sized and attractive residential or rural residential properties within the area is crucial to maintaining and growing communities. There is strong demand for this type of property that it is to be encouraged.	Sub 28.2 Reject. Section 4 of the GMS outlines the approach for Rural Residential zones in terms of the higher order statutory framework and provision is made for rural-residential opportunities. The CRPS allows for limited rural-residential provision. Monitoring provisions and review of the GMS assist in ensuring adequate provision to meet demand in accord with statutory frameworks such as the CRPS
			-	No Comment.	
		Strategic Directions	-		
			-		
			-		
			-		
29	H Henderson	Town Growth	29.1	Strongly disagree with multi storey apartments near to central city as they will bring further shading, block views, and have limited amenity and infrastructure in the centre. Why not consider greenfield development with the provision of shuttle bus services.	Sub 29.1 Reject. Approach as to consolidation focus of Chapter 5 RPS.
			29.2	Strongly agree with development at outskirts of city.	Sub 29.2 Noted.
		Strategic Directions	29.2, 29.1	Agree with expansion on the outskirt of city. Strongly disagree with high rise apartments near city centre. Where will facilities for older people be, meeting spaces etc.	Sub 29.2, 29.1 Reject. The CRPS outlines benefits of consolidation and integration of infrastructure, importance of getting design and open space requirements balanced with intensification.
			29.1	The character of Timaru or South Canterbury is not dense housing or high rise apartment living.	Sub 29.1 Acknowledged. Some high- rise apartment living may be appropriate in defined locations.
			29.3	Strategy seems to want less landscaping and parkland areas.	Sub 29.3 Reject. Requirements will be addressed in District Plan provisions.
			29.4	Agree with stopping ribbon development into productive farmland. Disagree with intensification of near city areas.	Sub 29.4 Support Acknowledged for reducing ribbon development. Consolidation (and intensification close to the city centre) is a requirement of the CRPS (Objective 5.2.1).
			-	Older persons contribute - it is not all 'take'.	
			29.5	Crossing SH1 as a pedestrian is a joke. Trucks need to be relocated and use the railway more.	Sub 29.5. Accept in part, Works in Washdyke are still on the National Land Transport Plan list of potential projects, although improved access has not been confirmed in terms of

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			29.5	Roading is a serious problem. Council blames State Highway system but surely united action plans can be agreed. Too many trucks on the road in town no wonder tourists leave quickly.	funding priority. This matter could be raised with the Council through the LTP process and/or with NZTA.
			29.6	Little consideration is given to streetscape.	Sub 29.6. Too specific for the GMS.
			29.6	People need their own space and it must be preserved as well.	Sub 29.6. Acknowledged.
			29.7	Council should be able to influence or have a say and communicate with NZTA for roading, Ecan for log burners and SCDHB for keeping elderly in their homes.	Sub 29.7. Council can only advocate on behalf of its residents. Mandate for the matters outlined in the submission lies with NZTA, Ecan and SCDHB respectively.
			29.8	Envisage what Timaru city area will look like if development occurs in accordance with the Strategy in 2043.	Sub 29.8. Acknowledged.
			29.9	Retention of some historic precincts, including buildings built for resilience not for 20-30 years.	Sub 29.9. Acknowledged.
			29.10	Botanic Gardens are extremely under used.	Sub 29.10. Acknowledged.
		Administration	29.11	All Council staff and Councillors should have no financial gain or have to declare land banking or any property which would be affected by the implementation of this draft strategy.	Sub 29.11. Reject. The LGA sets out a process around transparency of decision making and this is not a matter for inclusion in the GMS. The Council maintains a register of financial interests and any potential or perceived conflicts of interest must be disclosed.
30	A White	Town Growth	30.1	Future growth in Timaru depends on a number of variables: population growth, available options and how Timaru may attract people to come and stay.	Sub 30.1. Acknowledged and agree.
			-	No comment.	
			30.2	The submitter requested rezoning of 120 Cox Street, Geraldine for rural residential for the following reasons: - Cox Street is part of the greater Geraldine area. - Amenities e.g. power, sewerage are there. - Lack of available sites for people wanting an acre for lifestyle reasons. - Was zoned rural residential under the old Strathalan County.	Sub 30.2 Reject. Releasing land for rezoning now would not be an effective use of resources, nor assist in consolidated and coordinated development patterns. More suitable locations have been identified for residential development. Templar St and Cascade PI have been identified for rural-residential development around Geraldine and are preferred sites.
			30.2	People chose life style to live in a country area with a little bit of country.	
		Strategic Directions	30.3	All future growth in Geraldine is located to the northern side of the river. The southern side was not considered. Balancing act as outline towns within the District need as much consideration as Timaru. Sometimes this is not the case.	Sub 30.3 Statement. Reject. A map of future growth areas in Geraldine shows growth in all quadrants around the CBD and not just one part. In addition, the GMS has separate growth projections for Timaru, Temuka, and Geraldine.
			30.3	Most growth is located on the northern side of the river in Geraldine. This may result in unbalanced development and inequity in town.	Sub 30.3 Statement. No comment
			-	No Comment.	
			30.4	Footpath is critical to locals and tourists. Would like footpath to be provided outside the 100km on Cox St.	Sub 30.4 Statement. Too specific for GMS.
			30.5	On-going assessment with infrastructure demand is required with the growing population and tourists.	Sub 30.5. Accept in part. The purpose of the GMS is to account for such growth.
			30.6	Further residential growth on the outskirts of town down Cox Street is sought.	Sub 30.6 Reject. Releasing land for rezoning now would not be an effective use of resources, nor assist in consolidated and coordinated development patterns.

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			30.7	Love to see open spaces in town with playing areas and recreation.	Sub 30.7 Statement. No comment
			30.8	Great to know consultation approach is taken by Council.	Sub 30.8 Statement. Support noted.
31	Al Young	Town Growth	31.1	The proposed Orari Station Road residential area and residential deferred area would significantly affect the submitter's property at 583 Orari Station Road, in particular in regard of water supply and sewer disposal. Such effects will affect the property value as well as its ability to operate as a large farm. Ruakapuka Stream is a flood path if the Waihi River breeches its bank between the town and bridge over the Waihi River to Woodbury. The Stream should not have any impediments placed on the waterway, including the Cascade Place Rural Residential area. Sewer disposal and water supply will be problematic on 5,000sqm sections in this area.	Sub 31.1. Acknowledged but noted that this was the preferred area through the Options Assessment and any adverse effects on farm (water and wastewater) will be minimal as residential development proposed that will be fully serviced. Intensive residential development is proposed to maximise the use of the land resource. Accept in part. When the Cascade PI area is developed it will need to be developed to minimise any effects on the environment with the provision of services.
				31.2	
				31.3	
		Strategic Directions	31.4	The existing dispersed rural lifestyle development has resulted in conflicts with farming operations. Rural Residential in Orari and Woodbury should also be considered.	Sub 31.4 Accept approach in terms of targeted Rural Residential development. Development at Orari has been rejected, but Woodbury rural residential development has been recommended for inclusion in the GMS.
32	Al Young, Martock Holdings Limited, N Campbell, NL Newton, Mountain View Daries, D & M Shefford, R Taylor, and P Hobbs	Town Growth	32.1	Council has in the Geraldine area five community drinking water zones. Four of these bores are located west of Orari township, between the Waihi and Orari Rivers. These wells are shallow (less than 10m in depth) except for one bore at Orari that might be a deep bore (30-70m in depth). Shallow bores require a protection zone of 2,000m while deep bores require a protection zone of 500m. The shallow bores need to be deepened to below the 30m threshold to maintain good water quality, and considerably reduce the restriction zone placed on landowners.	32.1 Reject. The submission is more appropriately addressed in terms of the Council's functions and day to day operations associated with the LGA.

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33	N Robertson	Town Growth	33.1	<p>Generally agree with the approach. However, consider rural residential should not be placed at high value productive land on Orari Station Road and Main North Road. Instead, land with lower productive value but high aesthetic value should be further developed.</p> <p>The submitter requested consideration of 22ha land at 245 Downs Road, Geraldine for rural residential development for the following reasons:</p> <ul style="list-style-type: none"> - Geraldine Downs already has rural residential development on the northern facing areas and further development in this area would have little visual impact on amenity and landscape values. - There are many north facing areas that is suitable for housing with great views. - There will have little or no impact on neighbouring properties. - The land is unlikely to ever be a standalone productive farm unit. - There is market demand for lifestyle blocks of around 5.5ha. 	Sub 33.1 Reject Disparate from existing urban boundary will not meet CRPS criteria as to attachment to urban boundary and consolidation.
34	KiwiRail Holdings Ltd	Strategic Directions	34.1	Generally supports the Strategy including various aspects that help protect the rail network as a strategic transport network. Only amendments requested below.	Sub 34.1 Support noted.
			34.2	Add an element of practicality in Strategic Direction [2] Landscape and Amenity (ii) an option being to word it ' <i>improve amenity and design particularly in urban areas where practicable</i> '. The reason for this request is that improving the amenity around rail corridors may not be possible for public safety and operational reasons.	Sub 34.2 Reject. Strategic Direction 8 already provides for practicality in terms of role and function.
			34.3	Include the rail network in the fifth bullet point on page 37 Table D:1.5.	Sub 34.3 Accept insert "rail" into 5th Bullet Point
			34.4	Refer to rail in the support agency column for A9.4 and A9.5 in Table 11 in rural actions as rail is also subject to reverse sensitivity effects.	Sub 34.4 Accept , however KiwiRail is already present as a Support Agency.
35	Foodstuffs South Island Limited	Strategic Directions	35.1	Supports the reinforcement and consolidation of existing commercial centres and the priority intensification of the Highfield area.	Sub 35.1 Accept. While it is acknowledged that the consolidation approach is appropriate, it is considered that the GMS should differentiate between the town centre (where no additional commercial land is required) and suburban centres like Highfield Mall where some additional growth in commercial land will be required to encourage reinvestment and support proposed intensification of the surrounding residential neighbourhood. Accordingly, amendment to the GMS is proposed to recognise these differences and provide for modest growth of Highfield Mall which will complement rather than compete with commercial activity in the CBD.
			35.2	Opposes the blanket restriction on additional commercial land within the District.	Sub 35.1 Accept. There is no blanket restriction.
			35.3	Requests that the Strategy allows for the future expansion of existing commercial centres and those centres are identified so that existing commercial centres can respond to the increased demand brought about by residential intensification.	Sub 35.1 Accept in part. The GMS does not impede centre expansion as necessary but does not nominate areas of centre expansion into Residential zones as based on current commercial area surplus.
			35.4	Specific amendments to pages 15, 21, 32, 53, 63, 74, 75. Refer to original submission for requested wording.	Sub 35.4. Reject. The Property Economics Report identifies sufficient commercial land to 2048, and therefore there is no need given the DP planning horizon for the Council to include an expansion policy in the DP for its 10 year cycle.

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36	RP & PB Simmons Trustee Co Limited	Town Growth	36.1	<p>The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.</p> <p>Predicted growth is too conservative.</p>	Sub 36.1. Reject The council cannot oversupply residential capacity and provide infrastructure as this would be inefficient in terms of community asset provision.
			36.2	<p>The submitter requests own property at 29 Oakwood Road, Timaru be rezoned Rural Residential for allotments between 0.5ha - 2ha for the following reasons:</p> <ul style="list-style-type: none"> - The predicted Rural residential growth in Timaru is artificially low and more land is needed for rural residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Ashburton District significantly enables more Rural Residential development on the fringe of Ashburton than Timaru District even though it is 30% smaller in population. - The ease of servicing the land. It would be preferable for a Council initiated and maintained low pressure pumped sewer main to service this area (and beyond). - The land is close to existing settlement area. - The property is unique within the district with its proximity to Gleniti Golf Course and spectacular northerly views. 	36.2 Reject. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium- term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long- term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the GMS can provide for such demand projections.
			36.3	<p>The predicted Rural Residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p>	<p>36.3 Reject in part. Continuation of District Plan approach to rural residential in Timaru is not supportable given changes in CRPS. Approach is to provide RR in focused areas to meet enablement demands and achieve consolidation.</p> <p>Accept in part. It is noted that the 75/25 split was advised to the hearing panel as an aspirational goal and that there was no absolute or higher order document requirement associated with the proposed split.</p> <p>. The relevant Directive is District Character 1, which states: “Consolidate existing settlements with 75% of the district’s new dwellings to 2045 being accommodated within urban areas, through a combination of residential intensification and limited greenfield areas”.</p> <p>The Directive relates to ‘urban areas’. Accordingly, this would also accommodate residential development in zoned residential areas in the smaller settlements that are not a key feature of the GMS, such as Orari, Woodbury and Winchester within the 75% allocation.</p> <p>Ultimately, it is the hearing panel’s view that there is no specific answer as to whether 70% or 75% is the appropriate ‘target’ as no specific guidance is identified in the higher order documents. A 70% approach is likely to be more attainable and therefore should be referenced in the GMS</p> <p>That District Character 1 Directive be amended by the deletion of 75% and replacement with 70% and any subsequent reference in the GMS to 75% be amended by it’s deletion and replacement with 70%</p>

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37	S Smith, Booker, Irvine, Watson, Moir and Leonard	Town Growth	37.1	<p>The land in excess of 10 ha bounded by Rosebrook, Hadlow and Brockley Road be considered for subdivision down to 5 ha and should be zoned 'Hadlow Lifestyle Subzone'. The reasons given for the request include:</p> <ul style="list-style-type: none"> - It's a premium lifestyle area. It will provide for lifestyle choice and attract and retain people. - It will provide an affordable supply. - It won't constitute rural sprawl. - It won't detract from the rural aesthetic. - There won't be a loss in economic capacity. - It won't require any further investment by council. - Additional rates would be provided. - Soil is suitable for disposal to ground. 	<p>37.1 Reject. The proposed submission seeks a high(er) density rural character with subdivisions allowed down to a minimum of 5ha where the parent allotment exceeds 10ha.</p> <p>The proposal is more aimed at rural density than a growth strategy, per se. Increasing intensity of rural allotments disparate from the urban boundary is not consistent with CRPS Policy 5.3.1.</p>
38	Alpine Energy Limited	Town Growth	38.1	Overall support for the GMS and infill housing.	Sub 38.1. Acknowledged.
		Strategic Directions	38.2	<p>Electrical infrastructure may not have the required capacity for the future demand requiring investment in the network. Adjusting capital contributions for the time value of money is offered as solution.</p> <p>Purchasing of a subdivided lot are often unaware that they may have to pay for a connection to the electrical network. Informing purchasers that the lot does not have a connection to the electrical network is offered as a solution.</p> <p>Subdivisions in peri-urban areas can be piecemeal and adds additional costs if connections are not supplied at the same time. Suggested solution to require developers to connect to the network at the time of subdivision.</p>	Sub 38.2 Agreed that this needs to be communicated through DP / Infrastructure Code or Guideline, too specific for GMS
39	P & L Bartrum	Town Growth	39.1	<p>Requests their land at 4 Rayner Street, Pleasant Point, to be rezoned from rural to residential. This is requested on the basis that:</p> <ul style="list-style-type: none"> - a lot of residential land in Pleasant Point is either not available or is not suitable for development; their site is proximate to the existing urban boundary; - complies with the Regional Policy Statement; - is accessed directly from Smart Munro Road; would only result in a minor loss of productive land; would provide a suitable transition from residential to rural; scores well against the GMS criteria; can potentially be serviced; and -flooding is minimal. In respect of the site's flood hazard potential the submission notes that the problem that caused flooding of the site in 1986 has been fixed. 	Sub 39.1 Reject. An absence of residential supply would lead to market distortions, resulting in elevated residential sales prices. The GMS identifies sufficient residential land at Pleasant Point until 2028. However, this will be monitored given the monitoring and review provisions contained in the GMS.
40	New Zealand Transport Agency	Strategic Directions	40.1	The submission is in general support of the Strategy but with the following amendments requested.	Sub 40.1. Support noted
			40.2	General agree with the direction but request the listing of NZTA as a support agency for action A6.2.	Sub 40.2 Agree that NZTA be listed as support agency for action SA6.2.

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			40.3	Generally agree with this direction but request the following amendments: - Amend transport directive 3 to avoid sensitive activities establishing in proximity to the transport network. - Amend transport directive 5 to encourage alternative modes of transport. - Amend explanation E:2.7 to refer to the one network road classification system. - Amend E:2.8 to refer to the transport network and the state highway network.	40.3 Accept in Part. Infrastructure Directive No. 5 recognises the need to broadly protect all strategic infrastructure from incompatible and sensitive activities.
41	Community and Public Health	Strategic Directions	41.1	The submitter supports the Strategy and in particular Strategic Directions 2, 4, 5, 7, 8, 10, 11.	Sub 41.1. Acknowledged.
42	Ministry of Education	Strategic Directions	42.1	Council to consider how it will manage new activities in the vicinity of existing schools so that the efficient operation of schools is not affected.	Sub 42.1. Reject. The matters referred to depend on location of schools and basis of its protection, presumably these are designated in which case they are protected for Education activities as specified in the purpose of the Designation. 42.2 42.3 Too specific for GMS but issued to Transport Unit. 42.4 To be considered at a governance level. 42.5 There are no areas of new growth.
			42.2	Council to consider measures to mitigate increased traffic impacts on schools in areas of identified growth.	
			42.3	Council consider implementing sustainable and safe walking and cycling connections from identified growth areas and existing schools	
			42.4	Council and the Ministry to discuss the potential for co-sharing facilities including open space and community facilities.	
			42.5	The submission requests the Council consult and work with the Ministry in respect of identifying the need for new or extended education facilities in areas of identified growth.	
43	GA & JL Ward and Footes Trustees Limited	Town Growth	43.1	The submission requested the site to be incorporated into a 'Salisbury' Rural residential area that would have a total area of 29.93ha with minimum allotment size of between 0.5ha and 2 ha. The basis for this request is that: - The land is proximate to Timaru. - The land is accessible from sealed roads. - Can be readily serviced. - Is not subject to flood hazards and does not have versatile soils. - Is already developed at peri-urban densities and therefore aligns with Regional Policy Statement.	Sub 43.1 Reject. The land proposed for rezoning is a considerable distance (3.8km) from the urban boundary. No ability to distinguish if zoned with other sized allotments.

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
			43.2	<p>The submission questions the Strategy growth projections for rural residential development and suggests demand for rural residential development will be far higher than predicted. The predicted rural residential growth in Timaru is based on building consents figures, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>The submission disagrees with the Strategy direction to achieve 75% Residential to 25% Rural and Rural Residential split as rural residential growth is underestimated.</p>	<p>43.2 Reject. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium- term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long- term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.</p> <p>Furthermore, the GMS puts in place a monitoring regime so that any changes or emerging trends are considered and addressed if required.</p>
44	PSE Properties 2012 Limited and Hilton Haulage Limited Partnership	Town Growth	44.1	<p>The submission seeks to extend the Industrial H Zone to the east to include all of 72 and 86 Sheffield Street, which is currently zoned Rural 3. The main basis for this request is the predicted increase in rural production leading to increased demand for industrial land, particularly storage and transport services.</p> <p>The submission also states that the land is well serviced for vehicle access and other essential services. The submission suggest that the areas coastal flooding issue can be dealt with by minimum floor levels.</p>	Sub 45.1 Reject due to hazard risk.
45	Juice Products New Zealand Limited	Town Growth	45.1	<p>The submission seeks to extend the Industrial H zone to the east to include all of the site. The main basis for this request is that:</p> <ul style="list-style-type: none"> - The rezoning would accommodate further industrial growth associated with the submitter. - The land is well serviced for vehicle access and other essential services. <p>The submission suggest that the areas coastal flooding issue can be dealt with by minimum floor levels.</p>	Sub 45.1 Reject due to hazard risk.
46	South Canterbury Chamber of Commerce	Town Growth	46.1	The Chamber requested Council to consider an extension to the consultation timeframe as concerned there has been insufficient time to develop and collate data from a range of industries.	Sub 46.1 Accept. An extension was provided to allow greater time for making of submissions.
				The Chamber's main concern is that the information presented appears to be a forecast of stagnation. The Chamber believes growth will be greater and that the Strategy should be	Sub 46.2. Reject There is a statutory basis to the use of the NZ Statistics NZ Population Projections through the NPS-UDC and no robust alternative projections were provided.

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			46.2	<p>seeking to attract growth. The Chamber's view that growth will be greater is based on: their real experiences; further irrigation from Hunter Downs; investment in the Port; and tourism; which may not have been accounted for in typical Stats NZ projections.</p> <p>The Chamber requested Council to reconsider the current statistical data being used, factor in recent growth, prepare scenarios modelled on the likely expansions and growth. Council is also encouraged to be more proactive in encouraging development. The submitter suggests that the land that is perceived to be available is far less than is viable and actually available for development.</p> <p>The submitter recommends a two stage approach ensuring there is an ambitious growth plan mapped out (using deferred zones) and a separate model for infrastructure and investment should growth occur. Consideration needs to include current growth and actual viable available land and acknowledge that many families who choose to settle in the District like Timaru do so because of the choice of rural and lifestyle properties.</p> <p>It is suggested that the goal of the District Plan should be to enable investment at least to the extent matched by other South Island districts.</p> <p>The Council should invest ahead of developers to ensure sites are available for a range of activities so that services are always immediately available.</p>	<p>In respect of Industrial Land for the Timaru District, as outlined by the Property Economics report there is more than sufficient zoned Industrial land, at the macro district level to meet the 10- year (medium term) and 30- year (long term) demand. At a District level, the Industrial market is not constrained.</p> <p>However, the GMS will be monitored and reviewed and adjusted as necessary to provide any additional land that may be required as a result of the monitoring undertaken. There is land already available for industrial use.</p> <p>Through the submission process, the Hearing Panel has added both industrial and deferred industrial land to ensure adequate supply and choice.</p>
47	Majors Development Limited	Town Growth		The submission relates to 1 Mckechnie Street, Geraldine, which currently accommodates Madsden Engineering Ltd, who operates a modern workshop, retail store and associated offices. The submissions seeks to rezone the site from Residential 1 to Industrial L in order to address the shortage of industrial land in Geraldine. The submission notes that the properties to the north and east are zoned Industrial L and therefore rezoning the site will provide for continuity of zoning and further meet the goal of the Strategy of consolidation.	Sub 47.1 Accept. The Industrial zoning would be consistent with consolidation approach in CRP5.2.1, site can be serviced (CRPS 5.3.5 which seeks efficient servicing for development, including sewer and water), and would result in a defensible Industrial L boundary.
48	SM Fraser, AJ Shaw and PA Johnston	Town Growth	48.1	<p>Predicted growth is too conservative. Believe the NPS-UDC forecast for industrial land needs to be exceeded, with additional industrial land at Washdyke necessary.</p> <p>The submitter requested own property at 45 Washdyke Flat Road, Washdyke be rezoned Industrial for the following reasons:</p> <ul style="list-style-type: none"> - There is insufficient industrial land. - The land is readily achievable with essential services for light industrial. - Flood risk has been mitigated with recent upgrading of Washdyke Creek. - The land is located immediately west of the existing industrial area. - Was considered in the option report. 	<p>48.1 Accept. It is acknowledged at a macro level that there is a district wide surplus of available industrial land beyond 2048. Therefore, whilst there is no particular need for additional land to be rezoned for industrial purposes, it is considered that rezoning will allow potential development with the adjacent Seadown property, and would allow a more comprehensive, integrated and efficient approach to development.</p> <p>A requirement for the development of an ODP for both the subject site and the adjacent Seadown property is considered appropriate to ensure development and infrastructure integration occurs.</p>

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
49	McFarlane Family Trust	Town Growth	49.1	<p>Identify 49 & 63 Connolly Street, Geraldine as a residential growth area and rezone the Rural 1 and Rural 2 land to Residential 1 for the following reasons:</p> <ul style="list-style-type: none"> - It would achieve a consolidated pattern in Geraldine. - It adjoins the proposed Cascade Place Rural Residential and would provide a transitional zone. - It is not productive. - It is contiguous with existing infrastructure networks and services and would only place low demand in infrastructure. - Ease to access by road, cycle way and walkways. - Close to town centre and McKenzie Lifestyle Village. - There will be limited reverse sensitivity effects resulting from existing Rural 1 which can be addressed by the provision of landscaping. - Single landowner, easy to manage. - No known natural hazard. 	<p>Sub 49.1. Accept. It is considered that the McFarlane Family Trust property is appropriate to rezone for residential purposes. The property is contiguous with the existing Geraldine urban area and the existing Residential 1 zone to the south; and to the west, the McKenzie Lifestyle Village. Therefore, this meets the criteria for the consolidation approach.</p> <p>It is noted that Council's Infrastructure Team advised that there are no fatal flaws in the ability to service the subject site from an infrastructure perspective.</p> <p>Providing an additional area for new residential growth in Geraldine provides options by having multiple landowners of future growth areas and mitigates potential risk of a landowner not wishing to undertake residential development and therefore constraining the ability for future expansion of Geraldine.</p>
50	SM Fraser, AJ Shaw and PA Johnston	Town Growth	50.1	Seek the rezoning of 54 & 56 Timaru-Pareora Highway, Timaru from the current split Rural 1 and Rural 2 Zones to being fully zoned Industrial L. Activities at the site currently include Heartland Haulage Ltd, Aoraki Alternative Education Centre and Family Friends Timaru (pet crematoria).	50.1 Reject. At a macro level, Industrial zoning would be contrary to the consolidation approach in CRP5.2.1, site is also difficult to service efficiently given distance to Redruth and existing services (inconsistent with CRPS5.3.5 which seeks efficient servicing for development, including sewer and water), and would not result in a defensible urban boundary (and create expectations for linear industrial development along this corridor. At a micro level, the site already contains logistics yard type activities which requires little servicing. It is considered that the proposal is contrary with CPRS provisions 5.2.1, 5.3.1 and 5.3.5.
			50.1	Zoning request be considered both in terms of the Growth Management Strategy and the Timaru District Plan Review.	Sub 50.2 Reject. The submitter will need to lodge a formal submission to DP process in respect of any rezoning proposal.
51	Port Bryson Property Ltd	Town Growth	51.1	Seeks the rezoning of the land at 16-18 Hilton Highway, Timaru for 'business park use', being Commercial, with special reference to business park activities. Activities at the site currently include commercial /industrial uses.	Sub 51.1 Accept in part for 16 Hilton Highway only. The rezoning would reflect current land uses and does not provide vacant land opportunities for growth.
52	B Pipe	Town Growth	52.1	<p>The scoring system used to select future growth area has errors and asks that Council reviews its forecast demand for rural residential lots to ensure sufficient land is zoned to match demand.</p> <p>Specifically, Council should look at Hadlow and Oakwood Road, Timaru in the options report.</p>	52.1 Reject. It is a considerable distance (4.5km) from urban boundary to the subject area. No ability to distinguish if zoned with other sized allotments.

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		Strategic Directions	52.2	The Ryder Report seriously understates the demand for rural residential lots concluding that 330 dwellings will be required adjacent to Timaru for the period to 2045. The submitter outlines a 'conservative forecast' which estimates 900 dwellings are required.	Sub 52.2 Reject. Such an approach would provide for 50% of the Timaru District's 30- year (2048) household demand of 1,800 households through Rural Residential provision. There is a need to provide for a range of housing opportunities.
53	Heritage New Zealand Pouhere Taonga	Strategic Directions	53.1	Overall support for the Strategy, in particular the 'managed growth' with recognises the importance of reinforcing the existing centres. However, consider the Strategy can be strengthened with the following changes:	Sub 53.1 Support noted.
			53.2	P.9 Strategic Direction (2) Landscapes and Amenity (i) - Recognise and protect outstanding natural landscapes and natural areas and <u>heritage and cultural landscapes</u> in the district from inappropriate activities. P.34 Landscape, Biodiversity and Amenity - ... Appropriate preservation of the natural character of the coastal environment, outstanding natural features and landscapes, historic heritage including cultural and heritage landscapes. P.46 Action no A2.1 - Provide protection for outstanding and amenity landscapes, heritage and cultural landscapes and areas recognised of natural character, including the coastlines, wetlands, lakes and rivers.	Sub 53.2. Accept.
			53.3	P.36 Add to list in right hand column - 'Promoting seismic strengthen of older building stock.'	Sub 53.3 Agree that it is appropriate to add proposed amendment.
			53.4	P.39 Add following wording - 'Existing underutilised heritage building stock provides opportunity for intensification of residential activity making use of existing infrastructure, and access to amenities and transportation options. It also provides greater diversity of housing opportunities, diversifies the inner city population and support commercial activities such as restaurants and shops.'	Sub 53.4 Reject. Too specific for the GMS.
			53.5	P.66 Add to Table 14 - Provisions within the Replacement District Plan to encourage and incentivise seismic strengthening of heritage buildings, adaptive re-use of older buildings, and inner city living.	Sub 53.5. Accept in Part. The proposed amendment is supported but with two proposed amendments being: (a) It is considered that the insertion is better placed in Table 2, Action A1.3 District Character which already addresses this matter and as the District's heritage is not isolated to residential area; (b) That that the term incentivise is not proposed as this implies a funding basis from the Council for heritage retention, the extent of which is best considered under the LTP. Keeping the term 'encourage' is considered broad enough.
		Implementations	53.6	P.86 G.1.1 District Plan Review new wording - 'Consider ways in which the Replacement District Plan can encourage and incentivise seismic strengthening of heritage buildings, adaptive re-use of heritage buildings, and inner city living.'	Sub 53.6. Reject. Too specific for the GMS and would be part of the District Plan process.

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54	Milward Finlay Lobb Limited	Town Growth	54.1	<p>The submitter suggests that inadequate consideration has been given to the 75% target of all new dwellings being in the urban area.</p> <p>The applicant therefore suggests that a target of 60/40 rural urban distribution is adopted to match historical building consents and job availability statistics.</p>	<p>Sub 54.1. Accept in part</p> <p>It is noted that the 75/25 split was advised to the hearing panel as an aspirational goal and that there was no absolute or higher order document requirement associated with the proposed split.</p> <p>The relevant Directive is District Character 1, which states: “Consolidate existing settlements with 75% of the district’s new dwellings to 2045 being accommodated within urban areas, through a combination of residential intensification and limited greenfield areas”.</p> <p>The Directive relates to ‘urban areas’. Accordingly, this would also accommodate residential development in zoned residential areas in the smaller settlements that are not a key feature of the GMS, such as Orari, Woodbury and Winchester within the 75% allocation.</p> <p>Ultimately, it is the hearing panel’s view that there is no specific answer as to whether 70% or 75% is the appropriate ‘target’ as no specific guidance is identified in the higher order documents. A 70% approach is likely to be more attainable and therefore should be referenced in the GMS</p> <p>Also achieves other aims in the RPS i.e. use of rural land, infrastructure efficiency. Current building consent history taking into account exemptions approach for rural residential subdivision.</p> <p>That District Character 1 Directive be amended by the deletion of 75% and replacement with 70% and any subsequent reference in the GMS to 75% be amended by it’s deletion and replacement with 70%</p>
			54.2	<p>Disagree with the Strategy's modest population growth and significant increase in aging population.</p> <p>The submitter seeks council to recognise for a desire to replace employees as they retire and so grow the population. Such recognition should include sufficient additional zoned land both urban and rural residential to cater for the new employees to the District.</p>	<p>54.2 Reject.</p> <p>(a) The NPS2017 growth projections that identify an overall slow-down in growth, but an overall demand for 1,800 new dwellings Property Economics Report – Table 1.</p> <p>(b) An aging population, and the composition of households to also likely change, with a proportional decrease in ‘family households’ and an increase in ‘one-person households’. Growth Options Assessment. Section 1 – District Growth Assumptions. Figure 1.5: Natalie Jackson, University of Waikato.</p>
			54.3	Historically, there has been a disconnection between Industrial land rezoning and the provision of relevant services. Such disconnection has resulted in development frustrations for both potential purchasers and developers.	54.3 Reject. Installation of services is in combination with the Infrastructure Strategy and development of zoned Industrial land.
			54.4	Disagree with the predicted Rural Residential Growth. The submitter considers inadequate evaluation has been made in this assessment and future demand of such properties has been significantly under-projected.	54.4 Reject. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long- term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the GMS can provide for such demand projections.

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55	NA & SI Walker	Town Growth	55.1	The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed. Predicted growth is too conservative.	Sub 55.1. Reject. A capacity analysis was undertaken by the Timaru District Council in 2016. That survey removed potential yield based on a consideration of: land tenure, site shape and topography; and use. It also did not consider any additional capacity that could be made available through the further subdivision or intensification of sites with an existing dwelling. In this sense the assessment was quite conservative.
			55.2	The submitter requested to rezone own property at 585 Pleasant Point Highway, Timaru. The applicant considers the land has the following advantages compared with area 'Level 2' that was considered in the 'Options Report': - A smaller total land area which can achieve consolidation. - Reduced number of landowners. - It eliminates a large area of land subject to flood hazard. - The addition of sealed road frontage to Rolling Ridges Road provides for more flexibility in roading network and ease for future subdivision. - The suggested 2.0ha minimum allotment size would reduce the total number of new household to 30 within the area. Such a catchment size is considered to be viable sustainable for private wastewater and stormwater disposal.	Sub 55.2 Reject. Located in close proximity to the Timaru International Motor Racing speedway (600m) and southern end of the runway for Timaru Airport (1.9km). Despite being outside of statutory noise boundaries, it would potentially increase density of incompatible uses in this environment. It is located a considerable distance (9.0km) from urban boundary, and there is no ability to distinguish if zoned with other sized allotments. The proposal does not meet the consolidation criteria requirement.
			55.3	The predicted Rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low. The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area. Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated. The rating for Elloughton has been incorrectly calculated and should only be 115, not 121.	Sub 55.3 Reject in part. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long-term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the GMS can provide for such demand projections. Accept in part. It is noted that the 75/25 split was advised to the hearing panel as an aspirational goal and that there was no absolute or higher order document requirement associated with the proposed split. The relevant Directive is District Character 1, which states: “Consolidate existing settlements with 75% of the district’s new dwellings to 2045 being accommodated within urban areas, through a combination of residential intensification and limited greenfield areas”. The Directive relates to ‘urban areas’. Accordingly, this would also accommodate residential development in zoned residential areas in the smaller settlements that are not a key feature of the GMS, such as Orari, Woodbury and Winchester within the 75% allocation. Ultimately, it is the hearing panel’s view that there is no specific answer as to whether 70% or 75% is the appropriate ‘target’ as no specific guidance is identified in the higher order documents. A 70% approach is likely to be more attainable and therefore should be referenced in the GMS. That District Character 1 Directive be amended by the deletion of 75% and replacement with 70% and any subsequent reference in the GMS to 75% be amended by it’s deletion and replacement with 70%

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56	Levels Golfing Lifestyles Limited, and Timaru Golf Club	Town Growth	56.1	<p>The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.</p> <p>Predicted growth is too conservative.</p>	<p>Sub 56.1. Reject. The capacity analysis was prepared by the Timaru District Council in December 2016. Section 3.7 of this report identifies that Council Officers undertook the assessment of feasible residential capacity. That survey removed potential yield based on a consideration of: land tenure, site shape and topography; and use. It also did not consider any additional capacity that could be made available through the further subdivision or intensification of sites with an existing dwelling. In this sense the assessment was quite conservative.</p>
			56.2	<p>The submitter requested 37, 81, 83 & 85 Lynch Road, Levels be rezoned from Rural 1 to Rural Residential for the following reasons:</p> <ul style="list-style-type: none"> - The land is located adjacent to the Timaru Golf Club. - To secure some membership, and assist with volunteers required to help maintain the course and assist in sharing costs of internal roads, and plant replacement. - Rural residential demand was under estimated in the Strategy. 	<p>Sub 56.2 Reject. It is considered inappropriate at this stage to provide for any rezoning through the current GMS process given there is a need for engagement and discussion with several parties including NZTA.</p> <p>However, it is considered that the ‘Levels’ area adjacent to Timaru airport requires further consideration. it is an area that contains rural residential/lifestyle type land uses now. it seems appropriate that this area be further considered by the Council for some type of lifestyle/rural residential use. It is the panels view that whilst not required for strategic growth undertaking evaluation of this area to address relevant environmental and existing land use issues given the existing pattern of development. This is considered to be appropriately addressed through District Plan processes. It is inappropriate to consider this now as part of the GMS process as further evaluation and engagement with landowners, NZTA and adjacent land use activities/owners is required.</p> <p>There is already a level of activity in existence and this coupled with the aspirations of the Levels Golfing Lifestyles Ltd and Timaru Golf Club, it is considered worthy of further investigation. Ideally it would seem appropriate to undertake this work so any outcomes from it are included in the proposed District Plan when notified.</p> <p>The area is defined as that encompassed by the golf course, Lynch and Falvey Roads and the state highway.</p>
			56.3	<p>The predicted Rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p> <p>The rating for Elloughton has been incorrectly calculated and should only be 115, not 121.</p>	<p>Sub 56.3 Reject in part. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long- term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.</p> <p>Accept in part. t is noted that the 75/25 split was advised to the hearing panel as an aspirational goal and that there was no absolute or higher order document requirement associated with the proposed split.</p> <p>The relevant Directive is District Character 1 which states: “Consolidate existing settlements with 75% of the district’s new dwellings to 2045 being accommodated within urban areas, through a combination of residential intensification and limited greenfield areas”.</p> <p>The Directive relates to ‘urban areas’. Accordingly, this would also accommodate residential development in zoned residential areas in the smaller settlements that are not a key feature of the GMS, such as Orari, Woodbury and Winchester within the 75% allocation.</p> <p>Ultimately, it is the hearing panel’s view that there is no specific answer as to whether 70% or 75% is the appropriate ‘target’ as no specific guidance is identified in the higher order documents. A 70% approach is likely to be more attainable and therefore should be referenced in the GMS.</p>

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
					That District Character 1 Directive be amended by the deletion of 75% and replacement with 70% and any subsequent reference in the GMS to 75% be amended by it's deletion and replacement with 70% .
57	Harvey Norman Properties (N.Z.) Limited	Town Growth		<p>Agree with the consolidation approach at existing settlement areas.</p> <p>The submitter requested own land at 226 Evans Street, Timaru is rezoned from Industrial L to Commercial to reflect existing land uses and to be consistent with the resource consent to granted in 2014 to extent commercial activities within the site.</p> <p>The submitter also requested the remaining land at 226 Evans Street, Timaru be rezoned from Residential 1 to Industrial L as this area is south facing and prone to flooding risk, which is not suitable for residential development.</p>	Sub 57.1 Reject. Given: the existing land use pattern and presence of logistics and distribution activities; the established Harvey Norman and associated storage area; that medium and long term demands for retail provision can be met as outlined by the Property Economics report and the consolidation approach of the CRPS and the Strategic Directions of the GMS, it is not considered appropriate to rezone further land to Commercial.
58	Clarebrook Farms Limited	Town Growth	58.1	<p>The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.</p> <p>Predicted growth is too conservative.</p>	Sub 58.1. Reject. A capacity analysis was prepared by the Timaru District Council in December 2016 which undertook the assessment of feasible residential capacity. That survey removed potential yield based on a consideration of: land tenure, site shape and topography; and use. It also did not consider any additional capacity that could be made available through the further subdivision or intensification of sites with an existing dwelling. In this sense the assessment was quite conservative.

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
			58.2	<p>The submitter requested the 102.6341Ha area area of land at 362 & 376 Claremont Road, Timaru be rezoned from Rural 1 to Rural Residential to provide a maximum of 21 allotments with a Council approved Outline Development Plan. The rezoning is requested on the following basis:</p> <ul style="list-style-type: none"> - There is insufficient Rural Residential land is provided in the Strategy. - Capping the maximum number of allotments in the area is an effective method of achieving consolidation and manageable growth. - The size of the proposed allotments are a sustainable way of providing on-site stormwater and effluent disposal. - The land has esplanade strips suitable for public recreation on the banks of the Otipua Stream. - Land is in single ownership and owner is willing to develop the land. - Any potential reverse sensitivity issues with rural and residential activities can be managed by Council approved Outline Development Plan. 	<p>Sub 58.2 Reject. Subject area is located some 3.0km from urban boundary and extent of rezoning (over 100ha) would not promote urban consolidation. Accordingly considered contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are ‘attached’ to existing urban areas in a form that promotes a co-ordinated pattern of development.</p>
			58.3	<p>The predicted Rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p> <p>The rating for Elloughton has been incorrectly calculated and should only be 115, not 121.</p>	<p>Sub 58.3 Reject in part. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long-term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the GMS can provide for such demand projections.</p> <p>Accept in part. It is noted that the 75/25 split was advised to the hearing panel as an aspirational goal and that there was no absolute or higher order document requirement associated with the proposed split.</p> <p>The relevant Directive is District Character 1 which states: “Consolidate existing settlements with 75% of the district’s new dwellings to 2045 being accommodated within urban areas, through a combination of residential intensification and limited greenfield areas”.</p> <p>The Directive relates to ‘urban areas’. Accordingly, this would also accommodate residential development in zoned residential areas in the smaller settlements that are not a key feature of the GMS, such as Orari, Woodbury and Winchester within the 75% allocation.</p> <p>Ultimately, it is the hearing panel’s view that there is no specific answer as to whether 70% or 75% is the appropriate ‘target’ as no specific guidance is identified in the higher order documents. A 70% approach is likely to be more attainable and therefore should be referenced in the GMS.</p> <p>That District Character 1 Directive be amended by the deletion of 75% and replacement with <u>70%</u> and any subsequent reference in the GMS to 75% be amended by it’s deletion and replacement with <u>70%</u>.</p>

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
59	Timaru Civic Trust	Strategic Directions	59.1	<p>Timaru's heritage buildings should be a key element in the Districts identity. Priority should be given to protecting and enhancing the heritage buildings.</p> <p>Timaru's CBD should be highlighted as a key urban amenity element, which provides a central focus for shopping, entertainment and other civic activity.</p> <p>The CBD should be a key urban amenity element. Timaru's CBD should be a key location for residential intensification as there is existing empty building space, infrastructure and ample amenity.</p> <p>Strategy should deal with greater than expected / forecast growth of transport network capacity.</p>	Sub 59.1 Recognition, but not necessarily primacy is given to the District's heritage buildings. DP will recognise heritage fabric, as well as Heritage Precincts in the Timaru CBD. Not sure what additional material could be usefully added to the GMS.
			59.2	No consideration has been given to the issue of funding for earthquake strengthening and any compensation for the building owners.	Sub 59.2 Too specific for the GMS.
60	BA & TL Ellery	Town Growth	60.1	The submitters support the rezoning of Rural 1 land to Rural Residential at 14 Grange Settlement Road. Their support is based on the proximity of the owners property to the Residential 1 Zone, the availability of Councils piped sewer network and also the existing subdivision on the northern boundary of the site.	Sub 60.1 Accept. Need to manage Rural Residential supply to not undermine consolidation approach. However, services may not necessarily be provided to service any additional allotments.
			60.2	The submitter proposed a 0.2ha minimum allotment size (and a maximum of 0.5ha) to enable transition between the Residential 1 Zone and the 'Thompson' Rural Residential Zone.	Sub 60.2 Reject A 2,000m2 minimum is considered to be too urban in terms of character and amenity. A 0.5 to 2ha allotment size is recommended. The 0.5 minimum for rural-residential lots is a district wide minimum. There are also different servicing requirements.
61	GW & DS Craig & MWS Clark, KW & SM Pyke, GA & SA Morton & Woolcombe Trustees 2 Limited, GA & SA Morton, JR & JJ Ford, and PG & JA Wilkins & GJA Proudfoot	Town Growth	61.1	The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.	Sub 61.1. Reject. A capacity analysis was prepared by the Timaru District Council in December 2016 which undertook the assessment of feasible residential capacity. That survey removed potential yield based on a consideration of: land tenure, site shape and topography; and use. It also did not consider any additional capacity that could be made available through the further subdivision or intensification of sites with an existing dwelling. In this sense the assessment was quite conservative.
			61.2	<p>The Submitters seek the adoption of the "Kelland Heights" Rural Residential growth option.</p> <p>The submitters also requested their own properties at Pages Road, Timaru be rezoned Rural Residential 'extended Kellands Hill' for allotments between 0.5ha - 2ha for the following reasons:</p> <ul style="list-style-type: none"> - The predicted rural residential growth in Timaru artificially low and more land is needed for rural residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Ashburton District significantly enables more Rural Residential development on the fringe of Ashburton than Timaru District even though it is 30% smaller in population. - The ease of servicing the land. It would be preferable for a Council initiated and maintained low pressure pumped sewer main to service this area (and beyond). - The land is close to existing settlement area. 	Sub 61.2 Reject. Subject area is located some 1.5km from urban boundary and extent of rezoning (over 53ha) would not promote urban consolidation. Accordingly considered contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are 'attached' to existing urban areas in a form that promotes a co-ordinated pattern of development. Infrastructure issues identified in terms of efficiently providing for roading network.

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			61.3	<p>The predicted rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p>	<p>Sub 61.3 Reject in part. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long-term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the GMS can provide for such demand projections.</p> <p>Accept in part. It is noted that the 75/25 split was advised to the hearing panel as an aspirational goal and that there was no absolute or higher order document requirement associated with the proposed split.</p> <p>The relevant Directive is District Character 1 which states: “Consolidate existing settlements with 75% of the district’s new dwellings to 2045 being accommodated within urban areas, through a combination of residential intensification and limited greenfield areas”.</p> <p>The Directive relates to ‘urban areas’. Accordingly, this would also accommodate residential development in zoned residential areas in the smaller settlements that are not a key feature of the GMS, such as Orari, Woodbury and Winchester within the 75% allocation.</p> <p>Ultimately, it is the hearing panel’s view that there is no specific answer as to whether 70% or 75% is the appropriate ‘target’ as no specific guidance is identified in the higher order documents. A 70% approach is likely to be more attainable and therefore should be referenced in the GMS.</p> <p>That District Character 1 Directive be amended by the deletion of 75% and replacement with 70% and any subsequent reference in the GMS to 75% be amended by it’s deletion and replacement with 70%.</p>
62	DA & RM Coupland & MHS Trust Management Limited, MLS & RE Talbot, CI & DI Mackenzie, and EH & KP Andrews & EO Sullivan	Town Growth	62.1	The submitters supported their own properties at 385, 397, 403 and 469 Pages Road, Timaru be rezoned to Rural Residential 'Kelland Heights' option.	Sub 62.1. Acknowledged.
			62.2	The submitters considered the suggested allotment sizes without a connection to a Council reticulated sewer network of between 0.5 and 2ha to be practical. Preference is for Council to initiate and maintain a low pressure pumped sewer main to service this area (and beyond).	Sub 62.2. Reject. Ultimately, the GMS repeatedly identifies that public infrastructure should not be anticipated.
			62.3	Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.	<p>Sub 62.3 Reject in part. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long-term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.</p> <p>Accept in part. It is noted that the 75/25 split was advised to the hearing panel as an aspirational goal and that there was no absolute or higher order document requirement associated with the proposed split.</p> <p>The relevant Directive is District Character 1 which states: “Consolidate existing settlements with 75% of the district’s new dwellings to 2045 being accommodated within urban areas, through a combination of residential intensification and limited greenfield areas”.</p>

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					<p>The Directive relates to ‘urban areas’. Accordingly, this would also accommodate residential development in zoned residential areas in the smaller settlements that are not a key feature of the GMS, such as Orari, Woodbury and Winchester within the 75% allocation.</p> <p>Ultimately, it is the hearing panel’s view that there is no specific answer as to whether 70% or 75% is the appropriate ‘target’ as no specific guidance is identified in the higher order documents. A 70% approach is likely to be more attainable and therefore should be referenced in the GMS.</p> <p>That District Character 1 Directive be amended by the deletion of 75% and replacement with 70% and any subsequent reference in the GMS to 75% be amended by it’s deletion and replacement with 70%.</p>
63	ZJ Poplawski, CM & JL Morris, JM & NE Savage, ZJ Poplawski & HC Trustees 2009 Limited, J & B Family Trust, DC & CE Brand & HC Trustees 2010 Limited, DK & MK Coupland & TM Simpson, and DA & RM Coupland & TM Simpson	Town Growth	63.1	The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.	Sub 63.1. Reject . A capacity analysis was prepared by the Timaru District Council in December 2016 which undertook the assessment of feasible residential capacity. That survey removed potential yield based on a consideration of: land tenure, site shape and topography; and use. It also did not consider any additional capacity that could be made available through the further subdivision or intensification of sites with an existing dwelling. In this sense the assessment was quite conservative.
			63.2	<p>The submitters requested land adopt the 'Hadlow' Rural Residential Growth option accommodating allotments between 0.5ha - 2ha for the following reasons:</p> <ul style="list-style-type: none"> - The predicted rural residential growth in Timaru artificially low and more land is needed for rural residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Ashburton District significantly enables more Rural Residential development on the fringe of Ashburton than Timaru District even though it is 30% smaller in population. - The ease of servicing the land. It would be preferable for a Council initiated and maintained low pressure pumped sewer main to service this area (and beyond). - The land is close to existing settlement area. - The properties are unique within the district with their proximity to Gleniti Golf Course and spectacular northerly views. 	Sub 63.2 Reject. The subject area is located some 1.0km from urban boundary and extent of rezoning (over 50ha) would not promote urban consolidation. Accordingly considered contrary to Objective 5.2.1 and Policy 5.3.1 which seeks that rural residential areas are ‘attached’ to existing urban areas in a form that promotes a co-ordinated pattern of development.
			63.3	<p>The predicted rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p>	<p>Sub 63.3 Reject in part. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long-term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the GMS can provide for such demand projections.</p> <p>Accept in part. It is noted that the 75/25 split was advised to the hearing panel as an aspirational goal and that there was no absolute or higher order document requirement associated with the proposed split.</p> <p>The relevant Directive is District Character 1 which states: “Consolidate existing settlements with 75% of the district’s new dwellings to 2045 being accommodated within urban areas, through a combination of residential intensification and limited greenfield areas”.</p>

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					<p>The Directive relates to ‘urban areas’. Accordingly, this would also accommodate residential development in zoned residential areas in the smaller settlements that are not a key feature of the GMS, such as Orari, Woodbury and Winchester within the 75% allocation.</p> <p>Ultimately, it is the hearing panel’s view that there is no specific answer as to whether 70% or 75% is the appropriate ‘target’ as no specific guidance is identified in the higher order documents. A 70% approach is likely to be more attainable and therefore should be referenced in the GMS.</p> <p>That District Character 1 Directive be amended by the deletion of 75% and replacement with 70% and any subsequent reference in the GMS to 75% be amended by it’s deletion and replacement with 70%.</p>
64	AJ & CA Brosnahan, AR & FE Gale, AS Rabbidge & HR Singline & RSM Trust Limited, EA Pyke, FH Tong, BJ & HJ Walton and AN & DB Rountree	Town Growth	64.1	The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed.	Sub 64.1. Reject. A capacity analysis was prepared by the Timaru District Council in December 2016 which undertook the assessment of feasible residential capacity. That survey removed potential yield based on a consideration of: land tenure, site shape and topography; and use. It also did not consider any additional capacity that could be made available through the further subdivision or intensification of sites with an existing dwelling. In this sense the assessment was quite conservative.
				The submitter requested properties be rezoned in accordance with the Rural Residential 'Gleniti North' Growth option, with a deferred Residential overlay being the 'Gleniti Road' Residential Growth option, with a deferred zoning commencement date of 1 January 2019 (i.e. immediately after the short-term 2013-2018 projection) for the following reasons:	
			64.2	<ul style="list-style-type: none"> - The predicted residential growth in Timaru artificially high and less land is needed for residential. - The predicted rural residential growth in Timaru artificially low and more land is needed for rural residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Districts beyond South Canterbury offering extensive options for greenfield residential and rural residential development. - The ease of servicing the land. - The land is close to existing settlement area. - The properties are unique within the district with their proximity to Gleniti Golf Course and spectacular northerly views. 	<p>Sub 64.2 Reject. A deferment to 2019 is not considered appropriate given any potential would not be needed until the medium term (2028) if at all, and then if only to meet peak demand. By the time the replacement TDP Plan is operative it will be post 2019, hence relief is for a residential zone without deferment.</p> <p>It is considered that the residential relief is inconsistent with CRPS Objective 5.2.1 and Policy 5.3.1 and the consolidation and coordinated development approach inherent in those provisions, given the NZS2017 projections.</p> <p>There is a statutory basis to the use of the NZ Statistics NZ Population Projections through the NPS-UDC and no robust alternative projections were provided.</p>
			64.3	<p>The predicted residential and rural residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand came from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural.</p>	<p>Sub 64.3. Reject in part. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long-term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the GMS can provide for such demand projections.</p> <p>Accept in part. It is noted that the 75/25 split was advised to the hearing panel as an aspirational goal and that there was no absolute or higher order document requirement associated with the proposed split.</p> <p>The relevant Directive is District Character 1 which states: “Consolidate existing settlements with 75% of the district’s new dwellings to 2045 being accommodated within urban areas, through a combination of residential intensification and limited greenfield areas”.</p>

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					<p>The Directive relates to ‘urban areas’. Accordingly, this would also accommodate residential development in zoned residential areas in the smaller settlements that are not a key feature of the GMS, such as Orari, Woodbury and Winchester within the 75% allocation.</p> <p>Ultimately, it is the hearing panel’s view that there is no specific answer as to whether 70% or 75% is the appropriate ‘target’ as no specific guidance is identified in the higher order documents. A 70% approach is likely to be more attainable and therefore should be referenced in the GMS.</p> <p>That District Character 1 Directive be amended by the deletion of 75% and replacement with 70% and any subsequent reference in the GMS to 75% be amended by it’s deletion and replacement with 70%.</p>
65	Riverside Estate (2008) Limited, DE Ngaha & JM Hammond	Town Growth	65.1	<p>The submitter requested own property at 9 Grant Street, Temuka be rezoned Residential for the following reasons:</p> <ul style="list-style-type: none"> - The predicted residential growth in Temuka artificially low and more land is needed for residential. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. - The land is already zoned Deferred Residential 1. It is critical for the growth of Temuka that this Temuka west area is developed to its full potential within the 30 year period of the Strategy. - The residential zoning should have capital contributions for roading and associated essential services, removing the reliance on the downstream property developing first. Council will need to provide necessary public sewer connection that could be recovered by capital contributions. 	<p>Sub 65.1 Reject. Property is part of the Res 1 (North West Temuka) Deferred Zone, Infrastructure basis for deferral still relevant.</p> <p>The approach applied utilises the most up to date Medium Growth Statistics NZ Projections. Regular monitoring will be undertaken to maintain awareness of population growth and land uptake.</p> <p>GMS includes monitoring clauses to be responsive should growth projections change. No evidence has been provided regarding a projection model for the whole of Timaru District and it is inappropriate to have different projections for different parts of the District.</p> <p>There is a statutory basis to the use of the NZ Statistics NZ Population Projections through the NPS-UDC and no robust alternative projections were provided.</p> <p>The reasons for the current deferment zoning is that there is a need for the provision of infrastructure to service the subject land, and such matters have not as yet been resolved. It is noted that in the explanation for the current zone that it is intended that development occur sequentially to enable Council to budget funds for infrastructure extension. As yet this has not occurred.</p>
			65.2	<p>The predicted residential growth in Temuka is incorrect and artificially low. The Council is only bound to using Statistics New Zealand Data for the Timaru Urban Area to comply with the NPS-UDC. Council should be applying the pre March 2017 figures for predicted household units required for Temuka by 2043.</p>	<p>Sub 65.2 Reject. It would be inappropriate and have no basis for the Council to utilise two distinct population projections for adjoining settlements. Also, the NZ Stats Medium Projections are seen as the appropriate base, given NPS-UDC [and universal acceptance at Environment Court].</p>
66	A McCleary, and G & M Ladbroke	Town Growth	66.1	<p>The submitter requested own land located on the corner of Meadows Road and Aorangi Road, Washdyke (approximately 4.1ha, Lot 1 and 2 DP432561) be rezoned Deferred Industrial for the following reasons:</p> <ul style="list-style-type: none"> - To provide for future commercial / industrial growth and development in the region. Timaru is currently experiencing significant growth with regard to port activities, food production / processing activities, road transport activities and construction activities. The Timaru Economic Development Strategy 2015 seeks creation of 300 jobs per year (6000 by 2035) primarily in the aforementioned industries, which will require a significant area of suitable zoning for these primarily industrial activities. Draft GMS seems at odds with the growth estimates. - Existing provision of 103ha of Industrial land (both 70ha vacant and 33ha deferred) is considered insufficient to maintain land supply for growth of the region. - Current concentrated ownership of existing Industrial land within Washdyke is having an anti-competitive effect on development within the area. Introduction of new Industrial land within the area would dilute ownership to allow for increased competition within what is a limited market. 	<p>Sub 66.1 Accept in part. This area is separated from existing Washdyke Industrial Area by the undeveloped Expansion Area. However, it is considered that this area has potential for industrial purposes and is worthy of future consideration at some stage subject to monitoring and demand for industrial land. This is due to its location in proximity to the undeveloped expansion area.</p> <p>This land should be considered as deferred Industrial zone in the forthcoming District Plan review subject to services being available. This may involve defining a date or criteria to be met, so there is guidance as to when it would be appropriate to remove any deferment.</p>

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				- Land is question allows for natural expansion of the Washdyke Industrial Area. Area is serviced by existing roads,500 metres from the Council water mains, and near the Council main trunk sewer. It is also in a low residential area, with rural amenity already effected by existing prevalent industrial activity and the TDC wastewater facility. The above requested approach is a practical response to providing contingency for future growth and agility with managed infrastructure cost sharing without requiring the onerous, costly and time consuming exercise of either a private or Council led plan change to address shortages in industrial land in the future. It will also provide certainty to commercial interests seeking to establish activities within the zone.	
			66.2	The predicted industrial growth in Timaru is incorrect and artificially low.	Sub 66.2 Reject Predicted Growth rates are appropriately based on the Medium NZ Statistics Projections, acknowledging an increase in base projections. For the Timaru District, as outlined by the Property Economics there is more than sufficient zoned Industrial land, at the macro district level to meet the 10 year (medium term) and 30 year (long term) demand. At a District level, the Industrial market is not constrained.
67	LP & JA Moodie	Town Growth	67.1	The submitter requested own land located at 236 Meadows Road, Washdyke (25.75ha, Lot 3 DP432561) be rezoned Deferred Industrial for the following reasons: - To provide for future commercial / industrial growth and development in the region. Timaru is currently experiencing significant growth with regard to port activities, food production / processing activities, road transport activities and construction activities. The Timaru Economic Development Strategy 2015 seeks creation of 300 jobs per year (6000 by 2035) primarily in the aforementioned industries, which will require a significant area of suitable zoning for these primarily industrial activities. Draft GMS seems at odds with the growth estimates. - Existing provision of 103ha of Industrial land (both 70ha vacant and 33ha deferred) is considered insufficient to maintain land supply for growth of the region. - Current concentrated ownership of existing Industrial land within Washdyke is having an anti-competitive effect on development within the area. Introduction of new Industrial land within the area would dilute ownership to allow for increased competition within what is a limited market. - Land in question allows for natural expansion of the Washdyke Industrial Area. Area is serviced by existing roads,700 metres from the Council water mains, and near the Council main trunk sewer. It is also in a low residential area, with rural amenity already effected by existing prevalent industrial activity and the TDC wastewater facility.	Sub 67.1 Accept in part. This area is separated from existing Washdyke Industrial Area by the undeveloped Expansion Area. However, it is considered that this area has potential for industrial purposes and is worthy of future consideration at some stage subject to monitoring and demand for industrial land. This is due to its location in proximity to the undeveloped expansion area. This land should be considered as deferred Industrial zone in the forthcoming District Plan review subject to services being available. This may involve the District Plan defining a date or criteria to be met, so there is guidance as to when it would be appropriate to remove any deferment.
			67.2	The predicted industrial growth in Timaru is incorrect and artificially low.	Sub 67.2 Reject. Predicted Growth rates are appropriately based on the Medium NZ Statistics Projections, acknowledging an increase in base projections. For the Timaru District, as outlined by the Property Economics there is more than sufficient zoned Industrial land, at the macro district level to meet the 10 year (medium term) and 30 year (long term) demand. At a District level, the Industrial market is not constrained.
68	KD & MJ Cahill	Town Growth	68.1	The predicted 62.4ha development capacity within Timaru settlement area is too optimistic, in fact, the majority of land suitable for economic and feasible residential developments has been completed. Predicted growth is too conservative.	Sub 68.1 Reject. Predicted Growth rates are appropriately based on the Medium NZ Statistics Projections, acknowledging an increase in base projections. For the Timaru District, as outlined by the Property Economics there is more than sufficient zoned Industrial land, at the macro district level to meet the 10 year (medium term) and 30 year (long term) demand. At a District level, the Industrial market is not constrained.

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
			68.2	<p>The submitter requested own property at 50 Falvey Road, Timaru be rezoned Rural Residential for allotments between 0.5ha and 2ha for the following reasons:</p> <ul style="list-style-type: none"> - The predicted Rural Residential growth in Timaru is artificially low and more land is needed for rural residential. Ashburton District significantly enables more Rural Residential development on the fringe of Ashburton than Timaru District even though it is 30% smaller in population. - The area is already peri-urban in character. - The land is close to existing settlement area. - The land does not contain versatile soils. - The ease of servicing the land. - The ease of accessing the land from sealed roads. 	<p>Sub 68.2 Reject. Located in proximity to Runway for Timaru Airport (1.4km). Despite being outside of statutory noise boundaries, would increase density of incompatible uses in this environment. The submitters site is located some 7km from Timaru, and 6km from the urban boundary at Washdyke. No ability to distinguish if zoned from other similarly sized allotments, including those immediately adjacent the proposed rezoning.</p> <p>The proposal does not meet the consolidation criteria.</p>
			68.3	<p>The predicted Rural Residential growth in Timaru is based on issued building consents, which does not reflect the entire market. The prediction is therefore incorrect and artificially low.</p> <p>The submitter foresees the majority demand will come from retirees seeking modern houses in the rural residential area.</p> <p>Disagree with the Strategy's direction to achieve 75% Residential to 25% Rural and Rural Residential as growth in Rural Residential is underestimated.</p> <p>The rating for Elloughton has been incorrectly calculated and should only be 115, not 121.</p>	<p>Sub 68.3 Reject in part. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long-term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.</p> <p>Accept in part. It is noted that the 75/25 split was advised to the hearing panel as an aspirational goal and that there was no absolute or higher order document requirement associated with the proposed split.</p> <p>The relevant Directive is District Character 1 which states: “Consolidate existing settlements with 75% of the district’s new dwellings to 2045 being accommodated within urban areas, through a combination of residential intensification and limited greenfield areas”.</p> <p>The Directive relates to ‘urban areas’. Accordingly, this would also accommodate residential development in zoned residential areas in the smaller settlements that are not a key feature of the GMS, such as Orari, Woodbury and Winchester within the 75% allocation.</p> <p>Ultimately, it is the hearing panel’s view that there is no specific answer as to whether 70% or 75% is the appropriate ‘target’ as no specific guidance is identified in the higher order documents. A 70% approach is likely to be more attainable and therefore should be referenced in the GMS.</p> <p>That District Character 1 Directive be amended by the deletion of 75% and replacement with 70% and any subsequent reference in the GMS to 75% be amended by it’s deletion and replacement with 70%.</p>

Sub No.	Name	Topic of the Draft GMS that submission relates	Sub-Submission	Submission Reasons/Further Comments	Hearing Panel Decision & Reasons
69	P & J McLachlan	Town Growth	69.1	Request the rezone of 417 Timaru - Temuka Highway from Rural 1 to Rural Residential for allotments between 0.5ha and 2ha for the following reasons: - The land's proximity to town and amenity facilities - The land is surrounded with small rural blocks from 0.7ha to 6ha and will not give rise to adverse effects. - Given the existing fragmentation, the land cannot be changed to productive land. - Soil in this area are free draining providing suitable options for on-site effluent disposal and stormwater discharge. - The site is not known to any natural hazards.	Sub 69.1 Reject. Located in proximity to the runway for Timaru Airport (1.4km). Despite being outside of statutory noise boundaries, would increase density of incompatible uses in this environment. The submitters site is located some 7km from Timaru, and 6km from the urban boundary at Washdyke. No ability to distinguish if zoned from other similarly sized allotments, including those immediately adjacent the proposed rezoning. The proposal does not meet the consolidation criteria.
70	Davis Ogilvie (Aoraki)	Town Growth	70.1	The approach is conservative. Timaru is currently experiencing significant growth with regard to industrial and commercial activities. The proposed Industrial, Residential and Rural Residential land is considered insufficient to meet demand. Suggests Council to include more deferred zones to provide more options should growth is under estimated.	Sub 70.1: Industrial and Commercial: Reject. The Timaru District, as outlined in the Property Economics report has more than sufficient zoned Industrial land, at the macro district level to meet the 10- year (medium term) and 30- year (long term) demand. At a District level, the Industrial market is not constrained. Rural Residential: Reject. Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium-term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long-term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the DGMS can provide for such demand projections.
			70.2	It is unrealistic to consider the existing available in-fill areas and Greenfield areas can be developed within a reasonable timeframe to keep up with the demand. More Residential land is required.	Sub 70.2. Reject. The rezoning of additional land does not resolve any delays in providing infrastructure to have sites 'shovel ready'.

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			70.3	<p>Past experience shown that there is a significant time lag between when land is rezoned Industrial and when such Industrial land is 'available' - fully serviced and consented. The submitter recommended Council to discuss / gauge with significant land owners in Washdyke for growth forecasting.</p> <p>TDC or TDHL need to take a more proactive role in securing industrial and commercial land for future development to avoid private land banking.</p> <p>Seeks the areas east of Meadows Road be rezoned for additional deferred Industrial land in for the following reasons:</p> <ul style="list-style-type: none"> - It contiguous with existing industrial zoned land to the south. - Ease of servicing the land. - Although it will be a changed from primary produce production, it would provide the District's economic wellbeing by being productive Industrial land. - The area is not known to any natural hazard. - It will provide additional options and choices for businesses coming to the District. - These aspects are well supported in the 'Options Report'. <p>Timaru is currently experiencing significant growth with regard to port activities, food production / processing activities, road transport activities and construction activities. The Timaru Economic Development Strategy 2015 seeks creation of 300 jobs per year (6000 by 2035) primarily in the forementioned industries, which will require a significant area of suitable zoning for these primarily industrial activities (and spin off residential requirements). Strategy seems at odds with the growth estimates.</p> <p>A conceptual roading layout for the area is provided.</p>	<p>Sub 70.3 Reject. The Timaru District, as outlined in the Property Economics report has more than sufficient zoned Industrial land, at the macro district level to meet the 10- year (medium term) and 30-year (long term) demand. At a District level, the Industrial market is not constrained.</p>
		Strategic Directions	70.4	<p>The submitter feels that some important stakeholders and affected landowners haven't been adequately consulted with in the preparation of the Strategy, such as (not limited to):</p> <ul style="list-style-type: none"> - Surveying / planning consultants / property experts in our region. - Significant business operators (e.g. Port of Tauranga, Fonterra). - Transport / logistic companies. - Local real estate agents & valuers. - Hunder Downs Irrigation. - Building companies / master builders. - Property law society. - Immigration New Zealand. <p>Due to resource and time restrictions, public and stakeholders may not be able to respond during the notification period. Council need to be more proactive to get the public and stakeholder's involvement in the process.</p>	<p>Sub 70.4. Reject. The GMS has been open for submissions for a 6 week period and the opportunity for input provided.</p>

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71	South Canterbury Branch, New Zealand Institute of Surveyors	Town Growth	71.1	<p>Predicted growth is too conservative and more Residential and Rural-Residential land or deferred Residential and Rural-Residential land need to be provided because:</p> <ul style="list-style-type: none"> - Timaru is a town that supports a large rural population. Restrictions on rural subdivision will limit provisions for farmer's succession plan. Allowances need to be provided for boundary adjustments, non-builltable allotments and lifestyle blocks to avoid retired farmers leaving the District. - The impact of lifestyle blocks is not as significant as it once was with advancement of servicing and relevant planning provisions. - Over planning for population growth will have much less of a negative impact than under planning resulting in restriction. - Planning / deferred zoning now will save time and money in future. - Insufficient land supply may result in increased competition, compounding in inflated land values. - Not 100% of the land proposed to be re-zoned for future growth will be developable. - The desirable characteristics of Timaru is the open space / semi-rural feel. - No consideration of commercial land in western Timaru. - Increasing tourism and associated increase on the service sector could lead to a growing population. <p>Deferred zoning should be considered as a mean of controlling the progressive development.</p> <p>Council need to account for work being undertaken by public and private groups to promote and encourage industrial, commercial and economic investment in the region, recognising its associated social growth possibilities.</p>	<p>Sub 71.1 Reject</p> <p>The approach applied utilises the most up to date Medium Growth Statistics NZ Projections. Regular monitoring will be undertaken to maintain awareness of population growth and land uptake.</p> <p>GMS includes monitoring clauses to be responsive should growth projections change. No evidence has been provided regarding a projection model for the whole of Timaru District and it is inappropriate to have different projections for different parts of the District.</p> <p>Conservatively, applying the lower figure of 233 (rural residential household supply) illustrates that the medium- term demand (to 2028) is accommodated for the 5% to 10% demand requirements of between 60 – 120 dwellings, and that the long- term demand (to 2048) can also be accommodated for the 5% - 10% demand requirements. There is comfort that at a minimum the extent of rural residential zoning identified in the GMS can provide for such demand projections.</p> <p>There is a statutory basis to the use of the NZ Statistics NZ Population Projections through the NPS-UDC and no robust alternative projections were provided.</p> <p>In respect of Industrial Land for the Timaru District, as outlined by the Property Economics report there is more than sufficient zoned Industrial land, at the macro district level to meet the 10- year (medium term) and 30- year (long term) demand. At a District level, the Industrial market is not constrained.</p> <p>However, the GMS will be monitored and reviewed and adjusted as necessary to provide any additional land that may be required as a result of the monitoring undertaken. There is land already available for industrial use.</p> <p>Through the submission process, the Hearing Panel has added both industrial and deferred industrial land to ensure adequate supply and choice.</p>
72	K Wilson		72.1	Rural Residential development is really inefficient and a waste of productive land. Council should promote consolidation to reduce demand for Rural lifestyle properties.	<p>Sub 72.1 Reject. Approach seeks to recognise that there is a valid lifestyle demand for rural residential living and provide for it in a more sustainable manner, including encouraging intensification.</p> <p>Sub 72.2. Accept in part. It is difficult to future proof for all types of ethnicities and demands. The GMS seeks to recognise that there will be different approach to housing, employment and lifestyle and promote opportunities for these to be realised for all ages and ethnicities.</p>
			72.2	Does the strategy take into account the ethnicities of the future population. This young generation of multicultural mix will make up more than 50% of our total population in 30 years time. It will be different looking community, who will be more open to living centrally.	
73	B Speirs		73.1	Simply rezoning for residential intensification does not mean that it will occur. Examples including NW Temuka and Oceanview Timaru have shown land use contrasting with the zoning purpose.	Sub 73.1 Zoning only provides an opportunity for development to occur. However, it provides certainty to Council in terms of infrastructure spend and the market as to where development is directed.

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			73.2	The Growth Strategy indicates that there is sufficient land zoned for residential use, this is unlikely the case. The only way the district plan can influence the price of residential land is to have a large surplus of land zoned for residential use.	Sub 73.2 Simply rezoning additional residential opportunities does not, on its own, reduce house prices (other variables include construction costs, income and contributions for infrastructure). An oversupply of housing can reduce certainty in terms of community investment in infrastructure and property development and unnecessary increased costs for Council and ratepayers through inefficient infrastructure provision.
			73.3	The current dispersed rural living gives better community and social results, make better use of roading, power and telecom services, and provides more rural users with better services than economically be provided with lower residential densities.	Sub 73.3 Reject. Need to manage Rural Residential supply to not undermine consolidation approach.
			73.4	Greenfields development should be encouraged on the lower portions of catchments on the periphery of settlement areas, where connections for infrastructure do not require the replacement or upgrading of existing infrastructure, and where the costs of infrastructure can be placed on the developer.	Sub 73.4 The strategy has considered Greenfields options under the Options assessment, including criteria suggested. Apart from Geraldine it is considered that sufficient surplus exists to cater for demand.
			73.5	Strategy ignores the fact that alternative commercial areas have grown because the Timaru CBD does not have land for Large Format Retail (Supermarket, Warehouse, Harvey Norman) at a reasonable cost.	Sub 73.5 Reject. There is considerable surplus retail land to cater to 2028, longer term and large format capacity is present in the existing zoned, but undeveloped, showgrounds site. In addition, the showgrounds site can meet demand beyond 2048. The consented Countdown supermarket site and Harvey Norman site remain undeveloped.
74	Sally Hilton		74.1	Rezone Lot 1 DP 5504 from Rural 1 to Rural Residential. The property is less than 8ha is size, was once part of the school (to the south) and used as their agricultural block. It is unproductive as the 1986 floods eradicated the top soil and left the land with very little agricultural value. It is close to the town and school. Consideration could also be given to just making the road corridor available for building, whilst leaving the balance rural.	Sub 74.1 Reject. This is a site- specific matter and would require further detailed investigation regarding hazards.
75	Te Runanga o Arowhenua	Iwi	75.1	B:1 Ngai Tahu and Te Runanga o Arowhenua: Insert reference to 'Iwi Management Plan of Kati Huirapa for the Area Rakaia to Waitaki (1992)'.	<p>Sub 75.1 Accept in part. The 'Iwi Management Plan of Kati Huirapa for the Area Rakaia to Waitaki (1992) accounts for specific expression of kaitiakitanga and rangatiratanga for Te Rūnanga o Arowhenua and should be referenced.</p> <p>The <i>Mahaanui Iwi Management Plan</i> does not extend as far south as Timaru District. <u>The more specific 'Iwi Management Plan of Kati Huirapa for the Area Rakaia to Waitaki (1992) as prepared by Te Rūnanga o Arowhenua is dated. Both contain</u> However, there are a number of principles of relevance with the Management Plan that the Timaru District Council should consider under both the Local Government Act (2002) and the Resource Management Act (1991) in terms of both this Growth Management Strategy and also in terms of District Plan review processes.</p>

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			75.2	D:1 Strategic Direction 'Amend to read: <i>Work with Te Runanga o Ngai Tahu and the appropriate papatipu runanga, <u>that being Te Runanga o Arowhenua who holds manawhenua in this takiwa</u> to determine areas where....'</i>	75.2 Accept. Provides a more explicit reference.
			75.3	Strategic Direction [2] Actions and Responsibilities. Amend A2.1 and A2.4 to include ' <u>and Te Runanga o Arowhenua.</u> '	75.3 Accept. These matters are referenced in the Mahaanui Iwi Management and Iwi Management Plan of Kati Huirapa for the Area Rakaia to Waitaki (1992). Insert at A2.1and A2.4 Support Agency: <u>Te Rūnanga o Arowhenua</u>