

Chapter: SUB - Subdivision

Feed-back No.	Section	Sub-section	Plan Provision	Feedback	Relief sought
143.48	SUB – Subdivision	General		<p data-bbox="674 616 837 735">Overview and analysis of the Draft Planning Provisions</p> <ul data-bbox="875 395 1675 963" style="list-style-type: none"> · Subdivision is to deliver the pattern of development anticipated by respective zones, sequenced and align with supporting infrastructure, provide for esplanade areas and protect sensitive areas. · Public open space to be provided at time of subdivision where appropriate. · Provide for both vacant lot and existing/approved building subdivision in residential areas, as well as providing enabling provisions for development area subdivisions · Rural subdivision to be carefully managed. · Methods include controlled activity pathways for complying subdivisions (up to two allotments)) as well as number of standards relating to minimum lot sizes, three water connections and management, and Geraldine Downs Walking and Cycling Network. <p data-bbox="674 1209 801 1265">Submission</p> <ul data-bbox="875 986 1682 1449" style="list-style-type: none"> · [Redacted] support the provisions in principle and in practice, subject to the planned character for the zones being adequate. · The alignment of the subdivision provisions with the underlying zones is acknowledged and comment made elsewhere regarding zone enablement are deferred to. · In addition, the [Redacted] are of the view that the methods (rules and standards) should be clearer and more enabling in terms of allowing for development-led subdivision alongside vacant lot subdivision. Specifically, non-compliances on a new lot arising from a subdivision should not need to be re-litigated if the parent development is the subject of an approved land use consent (and/or is lawfully established, or could be carried out as a permitted activity). 	<p data-bbox="1688 874 1816 963">summary of actions requested</p> <ul data-bbox="1861 395 2152 1449" style="list-style-type: none"> · [Redacted] seek general amendments to the subdivision provisions to be more enabling in terms of allowing for development-led subdivision alongside vacant lot subdivision. · It is also requested that a notification preclusion statement is added for certain subdivision activities as noted above. · [Redacted] question recommended that TDC investigate the practicality of moving three-waters performance/engineering standards into a separate Code of Practice document outside the District Plan, that a particular network utility operator administers. This document may still be referenced in the District Plan itself as a means for best-practice.

				<ul style="list-style-type: none">· [REDACTED] experience of these types of development-led subdivision elsewhere involve: articulated rule for each type of subdivision pathway; a restricted discretionary activity status (not capable of being notified); and matters for discretion limited to the effect that the subdivision's design and layout has on the proposed sites, with reference to the design and layout of the development being subdivided around. · As an example, [REDACTED] recently submitted on the Proposed Selwyn District Plan seeking the following insertions into that Plan's Subdivision chapter, albeit limited to land use consent scenarios only:<ul style="list-style-type: none">o Rule: <i>Subdivision in the Residential Zones in Accordance with an Approved Land Use Consent.</i> o Parameters: <i>Any subdivision relating to an approved land use consent must comply with that resource consent.</i> o Activity Status: <i>Restricted discretionary activity.</i> o Matters for Discretion: <i>the effect of the design and layout of the proposed sites created.</i> o Notification: <i>Any application arising from SUB-RX shall not be subject to public or limited notification and shall be processed on a non-notified basis.</i> · [REDACTED] question whether three waters performance requirements are best placed within an RMA planning document, or within a separate Code of Practice that a particular network utility operator administers.	
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158.25	SUB – Subdivision	General		<p>1. The chapter proposes subdivision in the Coastal Environment Overlay be a fully discretionary activity. Policy SUB-P2 references ensuring the subdivision will not compromise the identified characteristics and values of the Overlay. As above, it needs to be made clear in the Coastal Environment chapter that the Overlay includes the Port, and that there is no expectation of the Port having characteristics of a similar nature to, for example, an undeveloped beach or dunes. We would also prefer that subdivision in the Port area not default to discretionary activity and the Port area should therefore be excluded from SUB-R12.</p> <p>2. [REDACTED] supports SUB-S9 which excludes [REDACTED] subject to our comments above about clarifying the extent of the Port area excluded.</p>	
12.1	SUB – Subdivision	General	General	<p>Request council to reconsider providing rural lifestyle zones of existing farm land at the peripheries of the town centres. Suggest rural lifestyle block be allowed within already cut lifestyle blocks as they have negligible productive values.</p> <p>So long as people are able to contain own sewage. People can rely on rain water connection. Rates must support increased rubbish collection and road repairs. The market will determine the desired size of lots.</p> <p>We have an interest in this suggestion as own a 10ha block which isn't allowed to be further subdivided under the current regime yet it has a superb potential building site which can be self serviced and would compromise no one. Yet neighbours are allowed to subdivide three 2 lot blocks in the original subdivision. This all seemed irrational.</p> <p>Main concern is we need to contain this way of living rather than encoaching on good productive farmland and have people further out of town.</p> <p>Suggest 2ha is a good size for rural lifestyle block.</p>	
61.1	SUB – Subdivision	General	General	<p>The specific provisions of the proposal that my submission relates to are:</p> <p>P7 Draconian rules regarding subdivision of land.</p> <p>Rules restricting the subdividing of land under 2 ha's as we don't want houses scattered everywhere - 2ha is to large. If a 10ha block can be subdivided into five - why not ten?</p>	

				<p><i>I oppose the arbitrary subdivision limits of 40, 10 + 2 ha's.</i></p> <p><i>Once again the TDC as a Council is drafting district plan rules from the perspective of an urban centre and a city-centric point of view. A view which regards rural areas as no more than a green recreational reserve, a park or an urban playground for the city dwellers relocation pursuits.</i></p> <p><i>Rural areas are in fact the hub of multimillion-dollar agricultural, horticultural, tourism and in many cases manufacturing industries such as [REDACTED]. All of which area large employers requiring employees close at hand. Many tourism business rely on establishment of accommodation.</i></p> <p><i>This district plan recognises the eight rural towns Temuka, Geraldine, Winchester, Orari, Pareora, Woodbury, Peel Forest, Pleasant Point, but fails to recognise historic and developing smaller urban settlements such as Cave, Milford, Mesopotamia, Hilton, Gapes Valley, Orari Bridge, Waitohi, Clandeboy and Rangitata.</i></p> <p><i>I seek the following decision from the Local Authority:</i></p> <p><i>To recognise that there is no reason why more subdivision could not occur in close proximity to existing rural houses which would allow for the settlement of non farming family members grandparent who might baby or child sit grandchildren or aunts and uncles. These relief labour force member are important to farming families.</i></p> <p><i>There is now many new advanced technologies and techniques such as solar panels battery and gas cooking and califonts which very economically solve energy, water and wastewater issues which once provided an obstical to additional housing in rural areas.</i></p> <p><i>Setting arbitrary limits on subdivision is necessarily obstructive and will obstruct development of tourism and agricultural and will hold back our region economically.</i></p>	
142.21	SUB – Subdivisio n	Gener al	General	<p><i>[REDACTED] has statutory functions to manage the State Highway network.</i></p> <p><i>In order to ensure that new infrastructure is provided for and constructed to the correct standard on the State Highway, particularly new vehicle crossings, that provisions are</i></p>	<p><i>[REDACTED] seeks the following to be included within the subdivision chapter of the plan:</i></p> <p><i>Prior to the obtaining of section 224 approval, if a site adjoins or connects to a</i></p>

				<i>included that relevant infrastructure has been constructed to relevant standards prior to the issue of certificate of title.</i>	state highway outside of an urban area, a [REDACTED] completion of works certificate will be required confirming a vehicle crossing has been constructed to required standards.
49.87	SUB – Subdivision	Objectives		Support [REDACTED] supports the reference to heritage overlays and the effects on cultural values when considering any subdivision proposals.	
43.80	SUB – Subdivision	Objectives	SUB-O2 Infrastructure Infrastructure	<i>Retain as proposed or preserve the original intent.</i> <i>This objective is consistent with the CRPS because it provides for infrastructure in a coordinated and integrated way.</i>	
80.9	SUB – Subdivision	Objectives	SUB-O2 Infrastructure Infrastructure	<i>Subdivision close to existing [REDACTED] facilities gives rise to reverse sensitivity effects (particularly if land is being used for sensitive activities such as residential developments) that may inhibit [REDACTED] ability to operate its facilities. Therefore it is important that reverse sensitivity effects are avoided.</i>	[REDACTED] seeks the following amendment: Subdivision design and development protects significant natural, ecological, historical and cultural features and resources and responds to the physical characteristics and constraints of the site and surrounding environment and avoids reverse sensitivity effects on regionally significant infrastructure and lifeline utilities.
96.20	SUB – Subdivision	Objectives	SUB-O2 Infrastructure Infrastructure	<i>Support and retain.</i> [REDACTED] supports the requirement for integrated, efficient and coordinated infrastructure to service new developments.	

145.47	SUB – Subdivisio n	Objecti ves	SUB-O2 Infrastructu re Infrastructu re	<i>support</i>		retain
22.1	SUB – Subdivisio n	Objecti ves	SUB-O4 Esplanade reserves and strips	<i>Will existing esplanade strips associated with waterways that are no longer specified be surrendered?</i>		
62.9	SUB – Subdivisio n	Objecti ves	General	<i>Support Objectives in full: Support clear objectives for subdivision in the general rural zone. Retain as proposed.</i>		
49.35	SUB – Subdivisio n	Policie s		Support	█ supports the reference to heritage overlays and the effects on cultural values when considering any subdivision proposals.	
49.162	SUB – Subdivisio n	Policie s		Support	█ supports the reference to heritage overlays and the effects on cultural values when considering any subdivision proposals.	
49.171	SUB – Subdivisio n	Policie s		Support	█ supports the reference to heritage overlays and the effects on cultural values when considering any subdivision proposals.	
80.10	SUB – Subdivisio n	Policie s	SUB-P1 Subdivision Enable subdivisio	<i>Subdivision close to existing █ facilities gives rise to reverse sensitivity effects (particularly if land is being used for sensitive activities such as residential developments) that may inhibit █ ability to operate its facilities. Therefore it is important that reverse sensitivity effects are avoided.</i>		█ seeks the following amendment: Enable subdivision that creates allotments that can accommodate anticipated land use and are consistent with the purpose, character, and qualities of the applicable zone and avoids reverse

					sensitivity effects on regionally significant infrastructure and lifeline utilities.
142.22	SUB – Subdivision	Policies	SUB-P3 Quality of the environment and amenity	<i>SUB-P4 Infrastructure</i> ██████ supports this policy to ensure that infrastructure has the appropriate capacity for the subdivision, that infrastructure is installed at the time of subdivision, and that legal and physical access to each allotment is created by the subdivision.	Retain as stated.
145.48	SUB – Subdivision	Policies	SUB-P3 Quality of the environment and amenity	<i>P4</i> <i>Support</i>	retain
43.81	SUB – Subdivision	Policies	SUB-P3 Quality of the environment and amenity	<i>Retain as proposed or preserve the original intent.</i> <i>Note: This policy provides for the protection of the quality of the environment.</i>	
22.7	SUB – Subdivision	Policies	SUB-P5 Esplanade reserves and strips	<i>Will impractical existing esplanade strips be surrendered?</i>	
72.14	SUB – Subdivision	Policies	SUB-P5 Esplanade reserves and strips	<i>SUB-P5-██████ supports the policy that identifies waterways that meet criteria for public access and the requirement of esplanade reserves or esplanade strips to be created when land is subdivided. Public access is eroded when it becomes fragmented until eventually practical public access no longer exists. Clause 3(e) allows for public access to be waived where the costs to provide for it outweigh the benefits. ██████ does not support this clause and questions how the 'potential public benefit' will be assessed and determined. It also does not give appropriate regard to SUB-O4. The same comment applies to SUB-S9 MoD (5).</i>	

43.82	SUB – Subdivision	Polici s	SUB-P8 Subdivision of land within a developm	<i>Retain as proposed or preserve the original intent.</i> █ supports the consideration of versatile soils and reverse sensitivity effects.	
62.11	SUB – Subdivision	Polici s	SUB-P10 Rural allotments	<i>Support in full: Support clear policy for subdivision in the general rural zone. Retain as proposed.</i>	
68.28	SUB – Subdivision	Polici s	SUB-P10 Rural allotments Avoid subdiv	<i>Item 2 talks about expected density, but gives no idea of what that density is, or how it changes throughout the GRZ.</i>	
43.83	SUB – Subdivision	Polici s	SUB-P11 Rural lifestyle Provide for s	<i>Retain, and consider adding an additional clause to avoid / minimise / mitigate adverse environmental effects arising from Rural lifestyle subdivisions.</i> █ supports the requirement for new Rural lifestyle allotments to connect to a reticulated system or else have a larger minimum allotment size.	
96.24	SUB – Subdivision	Polici s	SUB-P11 Rural lifestyle Provide for s	<i>Support.</i> █ supports the requirement that allotments connect to reticulated drinking water services or be capable of accommodating servicing on site. It is sought that the this be amended to include reference to the Code of Practice, to ensure consistency with the Code and to provide alternate options to applicants. <i>Amend as follows:</i> <i>Provide for subdivision that will enable residential lifestyle activities while maintaining the rural character and amenity anticipated in the Rural lifestyle zone by:</i> <ol style="list-style-type: none"><i>1. requiring allotments to either connect to reticulated wastewater, stormwater and drinking water services, or be capable of accommodating servicing on-site; and</i>	

				<ol style="list-style-type: none"> 2. requiring allotments to be provided with a [REDACTED] water supply connection in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ: PAS 4509:2008) including for access to water supply and each allotment. 3. maintaining minimum allotment sizes that are larger than urban residential sites, which can accommodate rural activities and that provide a rural outlook; 4. ... 	
62.12	SUB – Subdivision	Policies	SUB-P11 Rural lifestyle	<p><i>Support in full: Support clear policy for rural lifestyle subdivision and a resource management approach that avoids scattered activity.</i></p> <p><i>Note: Appears a disjoint with the strategic direction that requires allotments to connect to reticulated wastewater, stormwater and drinking water services, with this policy providing or be capable of accommodating servicing on-site</i></p>	
90.7	SUB – Subdivision	Policies	SUB-P7 Residential subdivision Provide	<p><i>SUB-P7(3) - Medium density residential zone by avoiding the creation of multiple vacant allotments or undersized allotments unless they are created around existing or proposed residential units;</i></p> <p><i>The Medium Density Residential Zone is already guided by rigorous Objectives and Policies, by further restricting development in terms of being undersized or vacant reduces the discretion of the Council. This ultimately sets a provision that does not encourage development which create vacant allotments for individuals to purchase. The practicalities of such an approach result in capital issues where landowners who wish to subdivide will have to sell to developers who can afford to build prior to selling sections and obtaining record of titles. This Policy will significantly restrict infill development within Timaru.</i></p> <p><i>SUB-P7(5) -avoiding the creation of small new residential allotments...</i></p>	

				<p><i>What defines small? Is there a threshold that Council will use to guide discretion? Or is this just referring to being undersized in comparison to the zone provisions? Or is small determined from the surrounding environment? I have some concern over how broad the interpretation of 'small' and Council already have satisfactory discretion guided from the other objectives and policies. The consideration of an effects-based RMA statutory process would, in my view, be more than sufficient.</i></p> <p><i>Solution</i></p> <p><i>SUB-P7(3) & (5)</i></p> <p><i>We request that SUB-P7(3) and (5) be omitted.</i></p>	
96.22	SUB – Subdivision	Policies	SUB-P7 Residential subdivision Provide	<p><i>Oppose in part.</i></p> <p><i>█ is generally neutral on subdivision and development, but request that there is specific reference made to ensuring that water supply is required in each zone.</i></p> <p><i>Amend SUB-P7 to include</i></p> <p><i>requiring allotments to either connect to reticulated water (capable of being used for firefighting) or be capable of accommodating servicing on-site.</i></p>	
62.10	SUB – Subdivision	Policies	SUB-P8 General rural zone	<p><i>Support in full: Support clear policy for subdivision in the general rural zone. Retain as proposed</i></p>	
68.27	SUB – Subdivision	Policies	SUB-P8 General rural zone Provide fo	<p><i>This policy is not consistent with community expectations, and may in fact destroy capital held by many rural landowners. where mortgage monies have been lent against existing entitlements.</i></p>	
80.11	SUB – Subdivision	Policies	SUB-P8 General	<p><i>█ seeks the following subparagraph be added to this policy:</i></p> <p><i>7. avoids reverse sensitivity effects on network utilities and infrastructure.</i></p>	<p><i>█ seeks the following subparagraph be added to this policy:</i></p>

			rural zone Provide fo		7. avoids reverse sensitivity effects on network utilities and infrastructure.
96.23	SUB – Subdivisio n	Policie s	SUB-P8 General rural zone Provide fo	<p><i>Oppose in part</i></p> <p>██████ opposes this policy as no regard has been given to water supply for ██████. It is recommended that this is included.</p> <p><i>Amend as follows:</i></p> <p>7. Is capable of accommodating all servicing on-site.</p>	
142.23	SUB – Subdivisio n	Policie s	SUB-P8 General rural zone Provide fo	<p>██████ supports the provision for Outline Development Plans (development area plans) and for developments to be undertaken in accordance with these plans.</p>	The policy is supported but it is also recommended Council give further consideration to whether policy or plan amendments should be included which require the provision of an Outline Development Plan/development area plan for developments of a certain scale.
96.21	SUB – Subdivisio n	Policie s	General	<p><i>Subdivision - Policy 4 - Infrastructure - Support in part with amendment</i></p> <p>██████ generally supports the requirement for subdivision to be connected to a water supply that is suitable for firefighting. To ensure consistency, it is recommended that the guidelines for water supply are those which are outlined in the Code of Practice.</p> <p><i>Amend Policy SUB-P4 (5) as follows:</i></p> <p>5. requiring allotments to have access to a water supply which is sufficient in terms of supply and access, consistent with the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ PAS 4509:2008), except where the allotment is for a utility, road, reserve or access purpose.</p>	

49.159	SUB – Subdivision	Rules		<table border="1"> <tr> <td data-bbox="672 201 869 325">Support</td> <td data-bbox="869 201 1673 325"> <p>██████ supports the reference to heritage overlays and the effects on cultural values when considering any subdivision proposals.</p> </td> </tr> </table>	Support	<p>██████ supports the reference to heritage overlays and the effects on cultural values when considering any subdivision proposals.</p>	
Support	<p>██████ supports the reference to heritage overlays and the effects on cultural values when considering any subdivision proposals.</p>						
145.70	SUB – Subdivision	Rules		<p><i>Rule framework</i></p> <p><i>SUB-R1</i></p> <p><i>SUB-R2</i></p> <p><i>SUB-R5</i></p> <p><i>SUB-R7</i></p> <p><i>Support</i></p>	retain		
90.9	SUB – Subdivision	Rules	SUB-R2 Subdivision in the Medium density res	<p><i>SUB – R2(13) – all allotments containing proposed buildings, provision of a consent condition requiring buildings to be constructed to the extent that the exterior is fully enclosed, before of certificate will be issued under s.224 of the Act.</i></p> <p><i>The need for such a provision is outdated in the Operative District Plan and the need to retain this creates significant financial restrictions for developers and landowners who require titles prior to being able to sell a development. No rational has been provided under the Objectives and Policies to require such a provision. The impractical requirement for dwellings to be at lock up stage is a significant restriction for development as capital cannot be obtained due to lending issues.</i></p> <p><i>Solution</i></p> <p><i>SUB – R2(13)</i></p> <p><i>We request SUB – R2(13) be omitted.</i></p>			

96.26	SUB – Subdivision	Rules	SUB-R2 Subdivision in the Medium density res	<p><i>Support in Part</i></p> <p>█████ supports including the provision of fire-fighting water supply as a matter of control for subdivision. It is noted that this is for all zones, excluding the Settlement Zone, Maori Purpose Zone and the Medium Density Residential Zone. Accordingly, this then applies to zones that may not be connected to a reticulated water supply network.</p> <p>█████ is also concerned with the matters of control relating to the design and provision of access and ensuring that this is also compliant with the Code of Practice.</p> <p>As such, █████ requests an explanatory note to the matters of control, to direct plan users to the Code of Practice.</p> <p><i>Insert explanatory note to rule as follows:</i></p> <p><i>“Regarding the provision of infrastructure, access and services for firefighting water supply, compliance with this should be measured against the standards as outlined in the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ: PAS 4509:2008)”</i></p>	
142.25	SUB – Subdivision	Rules	SUB-R2 Subdivision in the Medium density res	<p>█████ supports the rule as it promotes the integration of appropriate land use as a result of subdivision with the transport network, which includes roading, walking and cycling.</p>	Retain as stated.
96.27	SUB – Subdivision	Rules	SUB-R4 Subdivision that creates new allotmen	<p>█████ supports subdivision for network utilities and other infrastructure.</p>	

118.40	SUB – Subdivision	Rules	SUB-R4 Subdivision that creates new allotmen	<p>██████████ generally supports Rule SUB-R4 to the extent that the Rule provides for subdivision for the National Grid. That said, ██████████ considers that the Rule could be recrafted as a permitted activity rule and in doing so would provide a more efficient and effective approach to subdivision for important facilities.</p>	
142.27	SUB – Subdivision	Rules	SUB-R4 Subdivision that creates new allotmen	<p>██████████ supports the rule as it promotes the integration of appropriate land use as a result of subdivision with the transport network, which includes roading, walking and cycling.</p>	Retain as stated.
62.16	SUB – Subdivision	Rules	SUB-R7 Subdivision of land subject to a Development area plan	<p><i>Oppose:</i></p> <p><i>The plan should provide specific objectives, policies and rules for managing Development Areas.</i></p> <p><i>This should include a schedule of features and outcomes that are to be illustrated on an indicative subdivision concept plan to accompany the development plan that are directive on addressing the rural-urban interface. Eg encouraging the use of generous setbacks, public roads and reserves as buffers between urban and rural land uses.</i></p> <p><i>Provide specific objectives, policies and rules for managing Development Areas.</i></p>	
90.6	SUB – Subdivision	Rules	SUB-R7 Subdivision of land subject to a Deve	<p><i>SUB-R7 - Subdivision of land subject to a development area plan.</i></p> <p><i>The subdivision provisions are generally supported. However, we do seek further clarification on SUB-P8 in terms of alternative proposals that can achieve similar or better outcomes. This is enforced through SUB-R7. If a consultant prepared a development plan in general accordance with the objectives and policies in a zone with an existing development plan, would this be processed as a publicly notified application? If this is that case, we request that Council adopt a disclosure much like Selwyn District Council has in their Proposed District Plan to ensure changes to Development Plans are not expensive and do not become a drawn-</i></p>	

				<p><i>out task. As found with the Outline Development Plan for the Res 6 Zone, issues and changes arise during the development. Predicting such implications is impossible and that need to amend development plans should be accommodated in a process that does not restrict or cost the landowner to an extent of a publicly notified application.</i></p> <p><i>Solution</i></p> <p><i>SUB-R7</i></p> <p><i>We propose to include a disclosure provision for Notification, for example:</i></p> <p><i>“Any application arising from SUB-R7 shall not be subject to public or limited notification and shall be processed on a non-notified basis”.</i></p> <p><i>SUB – R7(13) – all allotments containing proposed buildings, provision of a consent condition requiring buildings to be constructed to the extent that the exterior is fully enclosed, before of certificate will be issued under s.224 of the Act.</i></p> <p><i>The need for such a provision is outdated in the Operative District Plan and the need to retain this creates significant financial restrictions for developers and landowners who require titles prior to being able to sell a development. No rational has been provided under the Objectives and Policies to require such a provision. The impractical requirement for dwellings to be at lock up stage is a significant restriction for development as capital cannot be obtained due to lending issues.</i></p> <p><i>Solution</i></p> <p><i>SUB – R7(13)</i></p> <p><i>We request SUB – R7(13) be omitted.</i></p>	
96.29	SUB – Subdivision	Rules	SUB-R7 Subdivision of land	<i>Support in Part</i>	

			subject to a Deve	<p><i>Little is yet known about the development areas, and while ██████ are generally supportive of the proposed matters of control, it is requested that an advice note is added to ensure consistency related to water supply and access across the district.</i></p> <p><i>Insert explanatory note to rule as follows:</i></p> <p><i>“Regarding the provision of infrastructure, access and services for firefighting water supply, compliance with this should be measured against the standards as outlined in the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ: PAS 4509:2008)”</i></p>	
142.29	SUB – Subdivision	Rules	SUB-R7 Subdivision of land subject to a Deve	<p>██████ supports the rule as it promotes the integration of appropriate land use as a result of subdivision with the transport network, which includes roading, walking and cycling.</p>	Retain as stated.
90.8	SUB – Subdivision	Rules	SUB-R3 Boundary adjustments All zones	<p><i>SUB – R3(6) – all allotments containing proposed buildings, provision of a consent condition requiring buildings to be constructed to the extent that the exterior is fully enclosed, before of certificate will be issued under s.224 of the Act.</i></p> <p><i>The need for such a provision is outdated in the Operative District Plan and the need to retain this creates significant financial restrictions for developers and landowners who require titles prior to being able to sell a development. No rational has been provided under the Objectives and Policies to require such a provision. The impractical requirement for dwellings to be at lock up stage is a significant restriction for development as capital cannot be obtained due to lending issues.</i></p> <p><i>Solution</i></p> <p><i>SUB – R3(6)</i></p> <p><i>We request SUB – R7(6) be omitted.</i></p>	
142.26	SUB – Subdivision	Rules	SUB-R3 Boundary adjustments All zones	<p>██████ supports the rule as it ensures the appropriate design and provision of access as a result of a boundary adjustment.</p>	Retain as stated.

142.24	SUB – Subdivision	Rules	SUB-R1 Subdivision to create new allotments	<p>██████ supports the rule as it promotes the integration of appropriate land use as a result of subdivision with the transport network, which includes roading, walking and cycling.</p>	Retain as stated.
43.84	SUB – Subdivision	Rules	SUB-R1 Subdivision to create new allotments	<p>Amend by adding CON-2 that applies only to the Rural lifestyle zone and requires connection to a reticulated wastewater system. If not met, the subdivision defaults to restricted discretionary.</p> <p>This would ensure that consideration of wastewater disposal and servicing can be undertaken at the time of resource consent for the subdivision.</p>	
90.10	SUB – Subdivision	Rules	SUB-R1 Subdivision to create new allotments	<p>SUB – R1(13) – all allotments containing proposed buildings, provision of a consent condition requiring buildings to be constructed to the extent that the exterior is fully enclosed, before of certificate will be issued under s.224 of the Act.</p> <p>The need for such a provision is outdated in the Operative District Plan and the need to retain this creates significant financial restrictions for developers and landowners who require titles prior to being able to sell a development. No rational has been provided under the Objectives and Policies to require such a provision. The impractical requirement for dwellings to be at lock up stage is a significant restriction for development as capital cannot be obtained due to lending issues.</p> <p>Solution</p> <p>SUB – R1(13)</p> <p>We request SUB – R1(13) be omitted.</p>	

<p>96.25</p>	<p>SUB – Subdivision</p>	<p>Rules</p>	<p>SUB-R1 Subdivision to create new allotments</p>	<p><i>Support in Part</i></p> <p>██████ supports including the provision of firefighting water supply as a matter of control for subdivision. It is noted that this is for all zones, excluding the Settlement Zone, Maori Purpose Zone and the Medium Density Residential Zone. Accordingly, this then applies to zones that may not be connected to a reticulated water supply network.</p> <p>██████ is also concerned with the matters of control relating to the design and provision of access and ensuring that this is also compliant with the Code of Practice.</p> <p>As such, ██████ requests an explanatory note to the matters of control, to direct plan users to the Code of Practice.</p> <p><i>Insert advice note to rule as follows:</i></p> <p><i>“Regarding the provision of infrastructure, access and services for firefighting water supply, compliance with this should be measured against the standards as outlined in the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ: PAS 4509:2008)”</i></p>	
<p>62.13</p>	<p>SUB – Subdivision</p>	<p>Rules</p>	<p>SUB-R1 Subdivision to create new allotments</p>	<p><i>Oppose:</i></p> <p><i>Oppose controlled activity status for subdivision to create new allotments in the GRUZ.</i></p> <p><i>Oppose the lack of a matter of control to consider potential reverse sensitivity effects with activities on surrounding sites.</i></p> <p><i>Change activity status to restricted discretionary.</i></p> <p><i>Add to matters of discretion:</i></p> <p><i>14. The potential reverse sensitivity effects with activities on surrounding sites</i></p>	
<p>63.1</p>	<p>SUB – Subdivision</p>	<p>Rules</p>	<p>SUB-R1 Subdivision to create</p>	<p><i>In the Medium Density zone (which i believe is replacing RES2 ?) the minimum allotment size of 300m2 and 13m diameter circle</i></p>	

			new allotments	<table border="1"> <tr> <td>Medium density residential zone</td> <td>3. Allotments must have a net site area no less than 300m² in area and dimensions that can accommodate a circle with a 13m diameter.</td> </tr> </table> <p><i>This is not much different from the current RES2 rules and while you have changed the way recession planes are applied to these sites have this restrictive allotment size and circle will not allow for suitable density. Minimum allotment should be 200m² with no min diameter or no minimum allotment, this will allow for multi story,terrace type housing similar to development around the Christchurch CBD. This type of development currently does not happen around the Timaru CBD because it is very difficult to design with the current planning rules. driveway widths in the current District plan also hinder this for when more than 2 dwellings on a site the required drive and 6x9 entrance also hinders suitable Density</i></p>	Medium density residential zone	3. Allotments must have a net site area no less than 300m ² in area and dimensions that can accommodate a circle with a 13m diameter.	
Medium density residential zone	3. Allotments must have a net site area no less than 300m ² in area and dimensions that can accommodate a circle with a 13m diameter.						
96.28	SUB – Subdivision	Rules	SUB-R5 Subdivision within the Settlement zon	<p><i>Support in part</i></p> <p>█ supports the matters of discretion including the provision of firefighting water supply, and the adequacy of the water supply for firefighting.</p> <p><i>In order to effectively measure the adequacy of the water supply, █ suggests the inclusion of an explanatory note to make specific reference to the Fire Fighting Water Supplies Code of Practice, to ensure consistency with the water supply requirements across the district.</i></p> <p><i>Insert explanatory note to rule as follows:</i></p> <p><i>“Regarding the provision of infrastructure, access and services for firefighting water supply, compliance with this should be measured against the standards as outlined in the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ: PAS 4509:2008)”</i></p>			

142.28	SUB – Subdivision	Rules	SUB-R5 Subdivision within the Settlement zon	██████ supports the rule as it promotes the integration of appropriate land use as a result of subdivision with the transport network, which includes roading, walking and cycling.	Retain as stated.
49.65	SUB – Subdivision	Rules	General	Support ██████ supports the reference to heritage overlays and the effects on cultural values when considering any subdivision proposals.	
80.12	SUB – Subdivision	Rules	General	<p>██████ is an affected party that ought to be notified if any subdivisions are proposed in close proximity to its facilities, because of the potential for reverse sensitivity effects that may impact on ██████ ability to continue operating its existing facilities.</p> <p>██████ has not always been notified of subdivision and development proposals in close proximity to its facilities in the past, and wants to ensure that it is properly notified and given the opportunity to submit in the future. This will help to ensure that adverse effects on ██████ facilities can be avoided, remedied or mitigated, and ██████ RNZ to continue operating its facilities into the future.</p>	<p>██████ seeks that a rule be included that requires any proposed subdivision within 500 metres of ██████ to be (at least) limited notified to ██████ so that ██████ has the opportunity to submit and have its concerns heard.</p> <p>For example: Rule [x]: Notification</p> <p>Where a proposed subdivision activity falls within 500 metres of an existing ██████ the Council will notify the operator of that site of the proposal (regardless of whether the Council considers that the effect of the proposal will be minor).</p>
134.4	SUB – Subdivision	Standards			Remove the requirements for telecommunications to be supplied to all

			<table border="1"> <tr> <td>SUB-S6</td> <td>Energy supply and telecommunications</td> </tr> </table>	SUB-S6	Energy supply and telecommunications	zones except residential and commercial zones	
SUB-S6	Energy supply and telecommunications						
			<table border="1"> <tr> <td>All zones</td> <td> <p>All new allotments, other than allotments for access, roads, utilities or reserves, must be provided with connections at the boundary of the net area of the allotment to electrical supply and telecommunication system networks.</p> <p>This standard does not apply to allotments for a utility, road, reserve or for access purposes</p> </td> <td> <p>Matters of discretion restricted to:</p> <ol style="list-style-type: none"> 1. alternative provision of telecommunication and electrical supply. </td> </tr> </table> <p><i>Under SUB-S6 it states that in all zones that telecommunication system networks should be provided (though there is discretion for alternate electricity and telecommunication supply). Given the advances in mobile technology providing telecommunications outside of residential and commercial zones should no longer be required</i></p>	All zones	<p>All new allotments, other than allotments for access, roads, utilities or reserves, must be provided with connections at the boundary of the net area of the allotment to electrical supply and telecommunication system networks.</p> <p>This standard does not apply to allotments for a utility, road, reserve or for access purposes</p>	<p>Matters of discretion restricted to:</p> <ol style="list-style-type: none"> 1. alternative provision of telecommunication and electrical supply. 	
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145.82	SUB – Subdivision	Standards	<p><i>SUB-S6 - Energy supply and telecommunications</i></p> <p><i>All zones</i></p> <p><i>All new allotments, other than allotments for access, roads, utilities or reserves, must be provided with connections at the boundary of the net area of the allotment to electrical supply and telecommunication system networks.</i></p>				

				<p><i>This standard does not apply to allotments for a utility, road, reserve or for access purposes</i></p> <p>Supported by ████████</p>	
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22.4	SUB – Subdivisio n	Standards	SUB-S1 Minimum allotment sizes and dimension	<p><i>RLZ</i></p> <p><i>Efficient subdivision use of irregularly shaped titles requires flexibility in lot size and shape - It would be more efficient use of available and scarce lands to adopt an average lot size discretionary approach where appropriate - perhaps with a minimum of 3000m2.</i></p>	
43.86	SUB – Subdivisio n	Standards	SUB-S1 Minimum allotment sizes and dimension	<p><i>Rural Lifestyle Zone</i></p> <p><i>Consider requiring a range of lot sizes between 0.5ha and 2ha in accordance with the definition of rural-residential development within the CRPS.</i></p> <p><i>Alternatively, consider encouraging reticulated wastewater systems where the density exceeds 1.5 dwellings per hectare in accordance with Policy 4.14A of the Land and Water Regional Plan.</i></p> <p><i>The current proposed minimum allotment size of 0.5ha may result in unacceptable cumulative effects from wastewater discharge if clusters of sites within this zone are not serviced and have onsite wastewater discharges.</i></p>	
68.29	SUB – Subdivisio n	Standards	SUB-S1 Minimum allotment sizes and dimension	<p><i>Item 4 sets a minimum 40 ha allotment area. As far as I am aware, no analysis has been undertaken to justify this limit, and I would note that for example the Department of Inland Revenue consider that an allotment of 10 ha is able to be utilised for productive purposes, as is further reflected in the current district plan rules for the rural 1 & 2 zones.</i></p>	
90.12	SUB – Subdivisio n	Standards	SUB-S1 Minimum allotment sizes and dimension	<p>Rural Lifestyle</p> <p>SUB-S1(6) – minimum allotment size of 5,000sq.m</p>	

In regard to development plans, a 5,000sq.m site that is shaped as a square is very difficult to achieve with high number of landowners in the proposed RLZ. In my view, is not true greenfield development as the land is already fragmented, therefore the development plans and density being less than 5,000sq.m is crucial in ensure success.

A great example of how effective a minimum allotment size of 4,000sq.m is illustrated in Penberly Road, Prebbleton, in the Selwyn District. The result environment from aerial imagery are attached at Appendix A of this submission.

Solution

SUB-S1(6) – *minimum allotment size of 4,000sq.m*

The transition between 700sq.m to 5,000 is considerably large. In most RLZ there is a natural divide between rural production land and lifestyle areas. The density of 5,000sq.m enables on site discharge, but what scope is there for connection to reticulated network in the Pages Roads area?

Remember the practicalities of connection to a reticulated network for sewer and water supply. The larger the allotments, the larger the costs. The development contribution system is still being drafted by Council, however larger lot sizes with such connections, as well as the issue of dwelling placement, may result in clustering of dwellings with larger vacant areas of land that are unable to be further subdivided.

				<p>The process moving forward shall include a collaborative public consultation process in regard to preparing Development Plans. The consultation should be guided by the IAP2 Spectrum on Public Participation.^[1] The issue with the approach is that the subject land is already significantly fragmented. Additionally, the area is rather affluent with people who regularly enquire about subdivision with us. Thus, it is not anticipated that this type of development would be that of usual greenfield development where a ‘developer’ purchases the land of one or two land owners and undertakes the subdivision.</p> <p>As it is anticipated that the Development Plans will in some cases be amended, a disclosure of notification is requested to ensure an amended layout design is not an unviable task for land owners. This matter is addressed further under following subdivision sections.</p> <p>^[1] https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/Spectrum_8.5x11_Print.pdf</p>	
62.14	SUB – Subdivision	Standards	SUB-S1 Minimum allotment sizes and dimensions	<i>Support in full: Support the minimum allotment size of GRUZ as 40ha. Retain as proposed.</i>	
86.11	SUB – Subdivision	Standards	SUB-S1 Minimum allotment sizes and dimension	██████████ considers that a 40ha minimum lot size in the General Rural Zone is appropriate.	Retain SUB-S1.4 as drafted.
134.1	SUB – Subdivision	Standards	SUB-S1 Minimum allotment sizes and dimension	<p><i>This submission is made in the name ██████████ ██████████ ██████████</i></p> <p>██████████</p> <p>██████████</p> <p>██████████</p> <p>██████████ In 2019 ██████████</p> <p>██████████ made application for a subdivision consent on ██████████ on the basis of the</p>	1. Any subdivision that would result in an area below 40ha be a Discretionary Activity (as opposed to the current Controlled Activity)

current subdivision rules which resulted in a total of 11 rural lifestyle blocks being created, most being in the 5000 to 8000m2 size. These lifestyle blocks effectively filled in the gaps of existing lifestyle blocks along [REDACTED] and was land that was generally difficult to irrigate and farm. The principals of [REDACTED] also carried out a boutique rural lifestyle subdivision [REDACTED] to [REDACTED] in 2008 where a consent was granted outside the Controlled Activity parameters. [REDACTED] most in the [REDACTED] lot that is [REDACTED]. The overall objective of this subdivision was to create a number of premium lifestyle lots that take a minimal area out of production and created a 'village' type environment that is not only appreciated by the residents that live there but all the many people that visit from outside the area. Some images of this development can be viewed at [REDACTED]

Issue 1

In the Draft Plan, under the Subdivision of Land Standards, SUB-S1, General Rural Zone, it is proposed that no land can be subdivided that would result in an area of less than 40ha be created. We submit that this is too restrictive. 10ha blocks We agree that the Controlled Activity rules under the current District Plan requires amendment, especially the ability to subdivide off 10ha blocks. Unless a subdivision resulting in 10ha blocks being created can be developed into a very intensive horticultural venture, like apples or berryfruit, then generally these very large lifestyle blocks are very poorly managed from an agricultural or horticultural production perspective and generally these large lifestyle blocks remove large areas from the productive capacity of the district. While a minimum size of 40ha might be applicable for a pastoral property we would submit that if the intended use is for an intensive fruit or vegetable operation then there should be some flexibility to subdivide below 40ha on the basis of a productive economic unit. 5000m2 blocks There is very high demand for small rural lifestyle blocks as we can attest from the sale of 11 lots on [REDACTED] [REDACTED] [REDACTED] [REDACTED] The point here is that people want this option in our district and if not available, may want to move to a district where there are rural lifestyle options. As long-term farmers and horticulturalists we don't want to see large tracks of high producing land being cut off into multiple lifestyle blocks with little economic output. To allow for some sensible rural lifestyle development throughout the district without unduly impacting on productive land then we

2. If a Discretionary Activity there would be no need to have limits on the number of lots that could be created as the consent application would only be successful on it's own merit.
3. That the 10ha and 2ha lot size Specific Control Zones and the Rural Lifestyle Zone in the Draft Plan be removed from the Plan
4. That any rural lifestyle allotments in the General Rural Zone should be as small as possible with a maximum of say 5000m2
5. In considering the conditions for Council to grant a Rural Lifestyle subdivision consent then such factors as the following to be taken into consideration:
 - a. The effect on the productive capacity post subdivision compared to pre subdivision
 - b. The impact on adjoining land owners
 - c. Reverse sensitivity considerations to allow normal agricultural/horticultural activities to take place on adjoining rural land
 - d. How the rural landscape will be affected from an aesthetic aspect

			<p><i>would submit that the lifestyle blocks should be as small as possible while still allowing for effective wastewater and stormwater discharge and that reverse sensitivity conditions be mandatory to allow for normal agricultural/horticultural practices to continue on adjacent rural land. Any rural lifestyle subdivision should also improve the aesthetics of the rural landscape and enhance biodiversity and generally improve the ecology of the rural environment and these aspects should be part of any subdivision consent (the [REDACTED] subdivision included the creation a significant wetland, native plantings and a walkway</i></p>	<p>e. How biodiversity and ecology may be enhanced through the subdivision development</p>

148.1	SUB – Subdivisio n	Standards	SUB-S1 Minimum allotment sizes and dimension	<p><i>Specifically concerns DEV9 - Guild Rural Lifestyle Development Area - Where Zoning is RLZ.</i></p> <p><i>Matters discussed:</i></p> <ul style="list-style-type: none"> · <i>████ raised traffic safety on █████ as an existing issue – prefer extension of 50km/hr. speed limit to the Rural Lifestyle Zone frontage due to volume of heavy trucks and safety risk of access.</i> · <i>Discussed inefficiency of installing fiber (happening now) without planning for future growth that could need replacement of footpaths.</i> · <i>Discussed the GMS: █████ considers that a more residential density (smaller allotment sizes) is appropriate for this area (more houses) because without which there will not be the incentive to pay the costs of infrastructure to develop the land for more houses.</i> · <i>Mentioned that a new road was needed to the north around the zone to provide access to new allotments, which would only be viable if more allotments at smaller site sizes were allowed.</i> · <i>The assumptions of population estimates that underpin the GMS are not accepted. More houses are needed now.</i> · <i>In summary, Rural Lifestyle Zone is the wrong zoning for the area. Sizes nearer 1,500m2 need to be allowed.</i> 	
151.1	SUB – Subdivisio n	Standards	SUB-S1 Minimum allotment sizes and dimension	<p><i>Matters discussed:</i></p> <p>████</p>	

1. All Rural Lifestyle Zone (RLZ) land identified in the Draft Plan is premium land, meaning prices will be really high, likely over \$500,000. There is no mid ground or low priced RLZ land zoned in the Draft Plan.

2. 2nd/3rd home buyers are looking for land and house packages around \$600,000 on 4,000-6,000m2 land. This is not achievable on the land identified as RLZ in the Draft Plan.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. Demand is also at or less than 5,000m2. E.g. 1,500m2, 2,500m2 etc.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

				<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>11. Understood it is difficult to get cheap land as it needs to be serviced, which is always going to be a challenge.</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	
101.16	SUB – Subdivision	Standards	SUB-S3 treatment, catchment and d	<p>Council could consider alternative methods for managing stormwater. Examples could include stormwater detention ponds and artificial wetlands. Such methods would implement Policy SUB.P3. It could also be a matter for discretion.</p> <p>In the Washdyke Industrial Area there are stormwater discharges that may ultimately flow into the Washdyke Lagoon Wildlife Sanctuary Reserve. There is land outside the Reserve that could be used to create wetlands to “pre-treat” the stormwater before discharge into the Lagoon. The limitation is that wetland vegetation should not be excavated to create a new wetland. Given there is an ECAN/TDC/DOC working party on this matter, any findings could possibly be implemented in the proposed plan framework.</p>	
22.2	SUB – Subdivision	Standards	SUB-S4 Water supply All zones In	<div style="border: 1px solid black; padding: 5px; width: fit-content;">General rural zone</div>	
22.5	SUB – Subdivision	Standards	SUB-S4 Water supply All zones In	<p><i>All Zones</i></p> <p><i>What are planned extensions to water supply network?</i></p>	

				<i>Will water supply be extended to Orari Station Rd RLZ?</i>	
96.30	SUB – Subdivisio n	Standards	SUB-S4 Water supply All zones In	<p><i>Support</i></p> <p>██████ supports the inclusion of water supply standards for all zones in the subdivision chapter.</p> <p><i>It is recommended this is retained, with the addition of an explanatory note.</i></p> <p><i>Add explanatory note as follows:</i></p> <p><i>** Regarding water supply connections and access to the water supply, the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ: PAS 4509:2008 should be consulted.</i></p>	
96.31	SUB – Subdivisio n	Standards	SUB-S7 Access All zones All allot	<p><i>Support</i></p> <p>██████ supports the access requirements for a subdivision, including the requirement for all allotments in the General Rural Zone to have a minimum access width of 8m. Providing an access with a width of 4.0m or wider enables fire appliances to access the site in the case of an emergency.</p>	
142.30	SUB – Subdivisio n	Standards	SUB-S7 Access All zones All allot	<p>██████ supports the standard that all allotments must have legal access to a formed road, access, access must not be to a State Highway and that access must be laid out and constructed in accordance with the Transport Chapter. The matters of discretion provide the opportunity for the applicant to consult with ██████ to obtain approval and ensure any access arrangement is appropriate.</p>	Retain as stated.
142.31	SUB – Subdivisio n	Standards	SUB-S8 Roads, cycleways and	<p>██████ supports this standard as it ensures that roads, cycleways and pedestrian accesses will be assessed under the relevant provisions in the Transport chapter.</p>	Retain as stated.

				<p><i>When the decision document was released for the submissions to the Growth Management Strategy, most of the submissions were rejected, however our submission (submission # 16) was recommended as "accept" below are the comments made on the decision document:</i></p> <p><i>Sub 16.1. Accept. it is considered appropriate for [REDACTED] to provide for as 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.</i></p> <p><i>As you can see by the above comments the panel recommended our submission based on what was presented to them, and also based on them travelling to [REDACTED] to inspect the area in question, we feel that any decision other than approval of the proposed rezoning would be a major turnaround to a decision made by the council and was publically notified.</i></p> <p><i>We are not looking at large scale development, instead low density subdivision that would place no drain on Council resources, it would provide more housing/lifestyle opportunities in what is an already desirable area. It would provide further opportunities for families such as our own to live in [REDACTED]</i></p> <p><i>[REDACTED] there is a desire by people who wish to become part of this thriving community, however the current level of property available doesnt allow for this.</i></p> <p><i>In our own individual circumstance for [REDACTED] our proposed subdivision would not be visible from the Road, and would take advantage of an existing driveway. We have consulted with all of our neighbours who are all supportive of what we would like to do.</i></p> <p><i>I would recommend that whoever is making the decision takes the time to come to [REDACTED] so that they can see for themselves what is is we are looking to do.</i></p>	
100.41	SUB – Subdivision	SUB-S7 Access	General	<p><i>SUB-S7: oppose in part, requiring an 8m width access way is excessive. We understand the need to have a minimum requirement to allow for emergency vehicles such are fire trucks and ambulances, however what TDC expects to be needing access at 8m is unclear.</i></p>	

				<i>In conjunction with requiring the first 20m to be formed, sealed and drained as per Transport S10, this becomes cost prohibitive, arbitrary, excessive and unnecessary.</i>	
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