

**BEFORE THE HEARING COMMISSIONERS  
IN TIMARU DISTRICT**

**IN THE MATTER** of the Resource Management Act 1991 (“**the Act**”)

**AND**

**IN THE MATTER** of the Proposed Timaru District Plan Hearing  
E Subdivision and Development Areas

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**STATEMENT OF EVIDENCE BY LYNETTE PEARL WHARFE  
FOR D & S PAYNE (SUBMITTER 160 AND FURTHER SUBMITTER 160)  
23 JANUARY 2025**

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## 1. SUMMARY

- 1.1 This statement of evidence addresses submissions and further submissions made by D and S Payne on subdivision objectives, policies, rules and standards for rural lifestyle zones, in particular the requirement in SUB-S1.4 of a 2ha minimum lot size if the lot is not connected to reticulated sewage.
- 1.2 The requirement in SUB-S1.4 is not supported by the Canterbury Regional Policy Statement, the Timaru Growth Management Strategy 2045 (GMS) or the s32 Report for Subdivision.
- 1.3 I consider that connection to reticulation is not an appropriate measure for establishing a minimum lot size as it fails to take into account the range of factors that will be assessed as part of onsite wastewater management system.
- 1.4 I support the s42A Report(7.1.27) that indicates that reticulation requirements should not be the basis for the 2ha minimum lot size.
- 1.5 However, I cannot find support in Council documents for a 2ha minimum lot for rural lifestyle development in proximity to urban areas, where such developments provide a transition from urban to rural.
- 1.6 Nor is such a lot size supported in the GMS.
- 1.7 A 2ha minimum lot size is an inefficient use of rural land and will lead to greater fragmentation and loss of productive capacity of rural land.
- 1.8 Larger lots further from urban centres may be appropriate to maintain a more open rural character.
- 1.9 Therefore, I support an amendment to SUB-S1.4 (4)

In areas in proximity to urban areas, 5000m<sup>2</sup> if there is a sewer connection to each residential lot, otherwise 2ha.

In any other areas, 2ha

## 2. QUALIFICATIONS AND EXPERIENCE

- 2.1 My name is Lynette Pearl Wharfe. I am a planning consultant with The AgriBusiness Group. I have a BA in Social Sciences and post graduate papers in Environmental Studies, including Environmental Law, Resource Economics and Resource Management.
- 2.2 I am an accredited commissioner under the Making Good Decisions programme with Ministry for the Environment.
- 2.3 I have been a consultant with The AgriBusiness Group since 2002. The Agribusiness Group was established in 2001 to help build business capability in the primary sector.
- 2.4 I have spent over 20 years as a consultant, primarily to the agricultural industry and rural sector, specialising in resource management, environmental issues, and environmental education and facilitation, including 20 years of providing advice to Horticulture New Zealand ("**HortNZ**") and its precursor organisations, NZ Vegetable and Potato Growers Federation, NZ Fruitgrowers Federation.
- 2.5 As part of providing advice to HortNZ for submissions and plans across the country I have been involved in development of Regional Policy Statements, Regional Plans and District Plans, including omnibus plans such as the Auckland Unitary Plan and the Marlborough RM Plan and district plans in Dunedin, Christchurch City, Selwyn, Waikato, Whakatane, Opotiki and Hastings so am familiar with the range of matters to be addressed in the Proposed Timaru District Plan ("**PTDP**").
- 2.6 I have read the Environment Court's Code of Conduct for Expert Witnesses, and I agree to comply with it. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## 3. SCOPE OF EVIDENCE

- 3.1 This evidence provides a planning assessment of those provisions on which David & Susanne Payne submitted and further submitted which are addressed in Hearing E Subdivision and Development Areas.
- 3.2 In undertaking this assessment, I have considered:
  - (a) The Section 42A Hearings Report for Hearing E Subdivision and Development Areas

- (b) The s32 Reports for PTDP and supporting documents<sup>1</sup>
- (c) Canterbury Regional Policy Statement 2013
- (d) Regional Land and Water Plan for Canterbury
- (e) National Planning Standards
- (f) Timaru District Growth Management Strategy 2045 and supporting documents<sup>2</sup>

#### **4. MY UNDERSTANDING OF D & S PAYNE'S SUBMISSIONS**

- 4.1 David and Susanne Payne made submissions and further submissions on the subdivision provisions in the PTDP because they consider that the proposed provisions are inconsistent with the CRPS and do not reflect the need for rural lifestyle development in the Timaru District, particularly the Geraldine area.
- 4.2 In particular the Payne's are concerned about provisions in the Rural Lifestyle Zone (RLZ) regarding lot sizes and on-site wastewater infrastructure, given provisions in the Canterbury Regional Policy Statement (CRPS) and the Land and Water Regional Plan.
- 4.3 They are concerned about duplication between plans and inconsistencies and complexity within the PTDP. They seek to ensure clarity and certainty for plan users.
- 4.4 Similar issues have been addressed in previous hearings for Strategic Direction and Rural Zones.
- 4.5 This evidence addresses the specific submissions and further submissions on the subdivision provisions.

#### **5. BACKGROUND TO SUBDIVISION PROVISIONS FOR RLZ**

- 5.1 There are a range of documents which are important to the provisions for subdivision in the PTDP:
  - (a) Canterbury Regional Policy Statement (CRPS)
  - (b) Canterbury Regional Land and Water Plan

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<sup>1</sup> Subdivision Discussion Document November 2016

Rural Residential Areas Discussion Document December 2016

<sup>2</sup> Timaru Urban Growth Strategy: Hearing Panel Decisions Report 10 April 2018

Timaru District 2045 Draft Growth Management Strategy Consultation Summary and Officer Recommendations November 2017

- (c) National Planning Standards
- (d) Timaru District Growth Management Strategy 2045 (GMS)

*Canterbury Regional Policy Statement (CRPS)*

- 5.2 The CRPS provides a directive framework to the district council in terms of providing for rural lifestyle within the district plan.
- 5.3 CRPS Objective 5.2.1 seeks development that achieves consolidated, well designed and sustainable growth in and around existing urban areas.
- 5.4 CRPS Policy 5.3.1 seeks to ensure that limited rural residential development occurs in a form that concentrates or is attached to existing urban areas.
- 5.5 The CRPS Policy 5.3.5 requires that development can be efficiently and effectively served for the collection, treatment and disposal of sewage and stormwater in order to avoid or mitigate adverse effects on the environment and human health.
- 5.6 The policies are to be given effect in district plans.

*Canterbury Land and Water Plan*

- 5.7 The Canterbury Regional Council has implemented CRPS Policy 5.3.5 through provisions in the Regional Land and Water Plan for on-site wastewater management, particularly Rule 5.8: Discharge of wastewater from a new, modified or upgraded on-site wastewater treatment system onto or into land in circumstances where a contaminant may enter water is a permitted activity providing conditions are met.
- 5.8 The conditions of Rule 5.8 include:
  - 1. The discharge volume does not exceed 2m<sup>3</sup> per day
  - 2. The discharge is onto or into a site that is equal or greater than 4 hectares in area
  - 3. The discharge is not located within an area where residential density exceeds 1.5 dwellings per hectare and the population is greater than 1000 persons.
- 5.9 If the permitted activity conditions cannot be met, including sites less than 4ha, then the activity is a restricted discretionary activity under Rule 5.9.
- 5.10 There is no requirement that a property needs to be connected to a reticulated sewer system.

### *National Planning Standards*

- 5.11 The National Planning Standard Zone Framework Standard describes the Rural Lifestyle zone:

*Areas used predominantly for a residential lifestyle within a rural environment on lots smaller than those of the General rural and Rural production zones, while still enabling primary production to occur.<sup>3</sup>*

- 5.12 While the Rural Lifestyle Zone is identified as a 'rural' zone<sup>4</sup>, it is important to recognise that the zone is 'predominantly for a residential lifestyle within a rural environment'.
- 5.13 While some primary production may still occur in the RLZ it is not the predominant activity in the zone and therefore protection of production activity should not be a determinant for the activities that occur within that zone, or be a criteria for subdivision in the RLZ.
- 5.14 The descriptor from the National Planning Standards is included in the PTDP as RLZ-O1 Purpose of the Rural Lifestyle Zone.

### *Timaru District Growth Management Strategy 2045*

- 5.15 The Timaru District Growth Management Strategy 2045 (GMS) sets out proposed areas where growth is anticipated to be provided over the next 20 years.
- 5.16 The GMS was notified for public consultation in 2016 and adopted by Council in 2018.
- 5.17 The GMS is a non-statutory document which can inform the district plan in identifying areas for growth to be provided for.
- 5.18 The GMS identified areas for rural residential, primarily adjacent to urban areas and bases assumptions of yield on a 0.5ha minimum site size or 1ha.<sup>5</sup>

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<sup>3</sup> <https://environment.govt.nz/publications/national-planning-standards/>

<sup>4</sup> Ministry for the Environment 2019 2G Zone Framework Standard Recommendations on submission Report for the first set of National Planning Standards  
<https://environment.govt.nz/publications/2g-zone-framework-standard-recommendations-on-submissions-report-for-the-first-set-of-national-planning-standards/>

<sup>5</sup> Draft Growth Management Strategy: Consultation summary and Officer Recommendations. Pg 39

[https://www.timaru.govt.nz/\\_data/assets/pdf\\_file/0006/158784/Officers-Report-on-Submissions-to-the-Growth-Management-Strategy-10.11.17.pdf](https://www.timaru.govt.nz/_data/assets/pdf_file/0006/158784/Officers-Report-on-Submissions-to-the-Growth-Management-Strategy-10.11.17.pdf)

- 5.19 The GMS was informed by studies that considered growth projections for the district and identified the need for rural residential locations.<sup>6</sup>

*Timaru District Plan - development*

- 5.20 The PTDP has undergone a lengthy development process including consultation on discussion documents in 2016 and a Draft District Plan in 2020.
- 5.21 The inclusion of specific Rural Lifestyle Zone (RLZ) was identified as a key variation from the Operative District Plan, as opposed to dispersed development throughout the rural area of the district.
- 5.22 The provisions for RLZ have therefore been developed through the plan process and constitute a new set of provisions in the PTDP.

## **6. SUBDIVISION - GENERAL SUBMISSIONS**

- 6.1 Submission 160.3 by D & S Payne and 160.14FS supporting Harper et al have been classified as 'general submissions' rather than on the specific provisions which they addressed.
- 6.2 The s42A Report addresses these submission points at 7.1.6 and at 7.1.26-27 outlines reasons to reject the submissions.
- 6.3 The Paynes sought that SUB-S1.4 for Rural Lifestyle be amended to remove the 2ha minimum lot size for sites providing on-site wastewater disposal. They consider that this requirement adds an extra layer of complexity when ECAN has explicit rules to address OSWM disposal.
- 6.4 The s42A Report (7.1.27) rejects the submission point and considers that a 2ha minimum lot size is appropriate for the following reasons:
- (a) 2ha is derived from the Timaru Growth Management Strategy (2016)
  - (b) To protect the character of rural and undeveloped areas in limited locations attached to existing urban boundaries
  - (c) Maintain capacity to function as predominantly productive, recreational and natural environments.
- 6.5 I do not concur with the reasons given by the writer.

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<sup>6</sup> Timaru District Growth Strategy 2017 Growth Assumptions Report  
[https://www.timaru.govt.nz/\\_data/assets/pdf\\_file/0017/114146/1057668-Notification-Draft-Growth-Management-Strategy-assumptions-report.pdf](https://www.timaru.govt.nz/_data/assets/pdf_file/0017/114146/1057668-Notification-Draft-Growth-Management-Strategy-assumptions-report.pdf)

- 6.6 The Timaru Growth Management Strategy 2045 bases provision for rural residential sites on 0.5ha or 1ha. For instance: Table 19 sets out Geraldine Growth Locations and determines capacity for rural residential assuming a 0.5ha minimum site size.<sup>7</sup>
- 6.7 It is unclear how the writer determines that a 2ha minimum lot size is derived from the Timaru Growth Management Strategy.
- 6.8 The s42A Report considers that 2ha minimum lot size is necessary to protect the character of the areas where rural lifestyle will occur.
- 6.9 Many areas proposed for rural lifestyle are adjacent to urban areas and development has already occurred in these areas.
- 6.10 This is certainly the case for the Main North Road East to Templer St, north of Geraldine. This block of 56.134ha is defined by Main North Rd, Templer St and Bennett Rd and is contiguous with the Geraldine township urban area. It is already subdivided into 38 titles, with some as small as 800sqm. This equates to an overall average lot size of 1.47ha. However, only 7 of the 38 properties are over 2ha. The other 31 lots that are less than 2ha have an average size of 0.7067ha.
- 6.11 This lot size forms a transition from the urban area to the rural area beyond the block and the surrounding roads constitute a defensible boundary for the zone changes.
- 6.12 In my opinion, a 2ha minimum lot size is not necessary to protect the open rural character of a rural lifestyle area, especially where it has already been changed by prior development and provides a transition to the General Rural Zone.
- 6.13 If a Rural Lifestyle Zone is to be located away from an urban boundary there may be a case to consider a different minimum lot size for such locations.
- 6.14 The s42A Report writer also considers that 2ha is necessary to enable lots to function as predominantly productive environments.
- 6.15 The National Planning Standards description for Rural Lifestyle clearly anticipates that the predominant activity in the zone is residential living, while some primary production activities may occur.
- 6.16 It is inappropriate to have an expectation for a predominance of primary production in areas identified for rural lifestyle.
- 6.17 While this is a shift from the approach in the Operative Plan it aligns with the National Planning Standards by providing for the

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<sup>7</sup> Timaru District 2045 Growth Management Strategy Part F Pg 79



identification of specific areas for rural lifestyle within the rural environment.

- 6.18 Therefore, I do not support the reasons the s42A Report writer has based the recommendation to reject the submission of the Payne's in respect to removal of the 2ha minimum lot size in the Rural Lifestyle Zone.
- 6.19 I will address other aspects of this issue in respect to SUB-S1 below.

## **7. SUBDIVISION OBJECTIVES – SUB-O1**

- 7.1 The Paynes (160.19FS) supported a submission by Federated Farmers (182.144) seeking that SUB-O1 be retained as notified.
- 7.2 The s42A Report at 7.2.23 recommends that reverse sensitivity be specifically included in SUB-O1.
- 7.3 I support that recommendation as it provides clarity and identifies that reverse sensitivity is an important issue to be considered.

## **8. SUBDIVISION POLICIES – SUB-P15 RURAL LIFESTYLE ZONE**

- 8.1 SUB-P15 states:

*Require subdivision in the Rural Lifestyle Zone to:*

*1. Maintain the character and qualities of the Rural Lifestyle Zone; and*

*2. Connect to the reticulated drinking water network; and*

*3. Require connection to the reticulated wastewater networks where available, or if not available, provide a suitable site area for on-site disposal; and*

*4. Maintain larger allotment sizes in the Geraldine Downs to protect its landscape character and amenity values.*

- 8.2 The Paynes (160.3) supported SUB-P15 and made further submissions (160.23FS, 160.35FS and 160.27FS) supporting Federated Farmers and Environment Canterbury submissions which supported SUB-P15 and sought that the policy be retained.
- 8.3 The s42A Report (7.3.35) identifies that the submissions support the policy and recommends that it be retained as notified.
- 8.4 I support this recommendation as the policy sets a very clear framework for how rural lifestyle developments will be assessed,

including the provision of onsite wastewater management where necessary.

- 8.5 As will be discussed below I consider that the flexibility provided within this policy needs to be implemented through the provisions in SUB-S1 in respect of establishing a minimum lot size for the RLZ.

## **9. SUBDIVISION STANDARDS – SUB-S1 ALLOTMENT SIZES AND DIMENSIONS**

- 9.1 SUB-S1 sets out the allotment sizes and dimensions according to zones. SUB-S1.4 relates to the Rural Lifestyle Zone:

*If no development area plan is required, allotment must have a net size area no less than:*

*1. 5000sqm for Lots 1 and 2 DP 444786*

*2. 2ha in the 2ha lot site special control area;*

*3. 10ha in the 10ha lot size specific control areas; and*

*4. in any other areas, 5000m<sup>2</sup> if there is a sewer connection to each residential lot, otherwise 2ha.*

- 9.2 The Paynes made a submission (160.3) on SUB-S1.4 seeking removal of the 2ha minimum lot size for sites providing on-site wastewater disposal and further submissions (160.6FS, 160.8FS, 160.1FS and 160.9FS) supporting submissions which seek similar changes to SUB-S1.
- 9.3 The submission sought that PTDP implement the ECAN policy approach on OSWM, but also provide Council the scope and discretion to achieve the best outcomes for a given property (e.g. working with natural landscape contours and property features) and avoid perverse outcomes (e.g. boundaries in inappropriate places to fit within rigid minimum lot sizes).
- 9.4 The submitters seek consolidation and avoiding wasteful use of an increasingly limited rural land resource and to provide for cohesive developments.
- 9.5 The s42A Report addresses the relevant submissions at 7.4.36 – 7.5.46 but does not recommend changes to amend the 2ha minimum lot requirement or the other issues identified by the submitters.
- 9.6 Of particular interest is the response to the MFL submission (7.5.46) where the writer discusses that the 5000m<sup>2</sup> allotment size is appropriate adjacent to urban areas as the size can be absorbed within the environment but incongruous further from urban areas.

9.7 Such an approach would indicate that there is a basis for differentiation in minimum lot size depending on the proximity to an urban area.

9.8 I discuss this issue further in Section 10 below.

## **10. ESTABLISHING A MINIMUM LOT SIZE FOR RLZ**

10.1 The Rural Lifestyle Zone (RLZ) is a new zone within the Timaru District Plan and as such there is no precedent for specific provisions, including minimum lot sizes, for the new zone.

10.2 The focus of the PTDP is for rural lifestyle to primarily be located adjacent to urban area, which gives effect to Policy 5.3.1 of the CRPS which requires that rural residential development be attached to existing urban areas.

10.3 The Consultation Review and Officer Recommendations for the GMS (Pg 32) identifies that CRPS Pol 6.39 requires reticulated sewer and water supply for rural residential development within the Greater Christchurch area but that such a requirement does not exist outside that area within the wider region.

10.4 For the areas outside Greater Christchurch the requirement in Policy 5.3.1 is:

*Within the wider region it is important that areas zoned for rural residential development are located close to existing towns and villages so as to ensure efficient utility servicing and patterns of transport.*

10.5 Given that there is no direction in the CRPS like for the Greater Christchurch area the PTDP does not need to require reticulation for rural residential areas.

10.6 The GMS report (Pg 32) notes that:

*Given the Timaru District context efficient servicing may likely be reliance on septic tanks and water tanks. There should not be an expectation of public servicing of individual rural residential allotments.*

10.7 I concur, as in my experience infrastructure for water and sewage in rural areas, including rural lifestyle areas, is predominantly provided on-site, rather than connected to reticulated networks.

10.8 The PTDP SUB-S1.4 proposes lot sizes for specific areas and then *'in other areas 5000m<sup>2</sup> if there is a sewer connection for each residential lot, otherwise 2ha.'*

- 10.9 The s32 Reports for Subdivision and Rural Zones provide an overview of the issues relating to rural lifestyle but do not include any specific discussion on lot sizes.
- 10.10 There are links to GMS documents which identify site sizes of 5000m<sup>2</sup> or 1ha and, as stated above, an expectation for on-site servicing.
- 10.11 In particular, I have been unable to find discussion and reasons for how the 2ha minimum lot size without sewer connection has been established.
- 10.12 The question arises as to whether linkage to a sewer connection is the most appropriate means of establishing a minimum lot size in the RLZ, particularly given provisions in both the PTDP and the Canterbury Land and Water Plan.
- 10.13 Any rural lifestyle lot that does not have a sewer connection will require resource consent from Environment Canterbury unless it is permitted by Rule 5.7 in the Canterbury Land and Water Plan (CLWP). Any site under 4ha will require a restricted discretionary consent under Rule 5.9 of the CLWP, with a list of matters to be met.
- 10.14 SUB-S4 in the PTDP sets out requirements for wastewater disposal. RLZ is included in section 2 under Rural Zones which requires connection to reticulated networks in specific situations. Where a connection to the Council's urban reticulated wastewater system is not available the subdivision application must demonstrate that the discharge of wastewater to ground either complies with the regional plan or has a discharge consent.
- 10.15 Therefore, consideration of the efficacy of the disposal system will be assessed at the point of consent. Size of the site is part of the assessment of such a proposal.
- 10.16 There are a range of factors which need to be taken into account when designing an onsite wastewater management system, including typography, soil type, soil holding capacity, nitrogen levels, proximity of waterbodies including groundwater and drinking water zones, proposed discharge rate for the proposed development, the proposed system to be installed and the ability of the system to meet the NZ Standard 1547:2012 On-site Domestic Wastewater Management. The system should be designed to be the best fit for the property (including size) given all these factors.
- 10.17 Such variables mean that the area requirements for a system will vary. Hence the lot sizes for a development will need to take such factors into account in the design of the development.

- 10.18 Therefore, requiring a minimum lot size dependent on the OSWM system is a blunt tool and does not take into account the factors which will be part of a resource consent application for subdivision from TDC and OSWM disposal from Environment Canterbury.
- 10.19 I am aware that suitable onsite wastewater systems can be provided on lots of 5000m<sup>2</sup>. In the Geraldine area ECAN have issued recent onsite wastewater management consents for properties ranging in size from 1000m<sup>2</sup>, 2642m<sup>2</sup>, 2915m<sup>2</sup>, and 6700m<sup>2</sup>.
- 10.20 SUB-P15 Rural Lifestyle Zone requires connection to the reticulated wastewater networks where available, or if not available, provide a suitable site area for onsite disposal.
- 10.21 The policy does not stipulate that a minimum lot size be set – rather that there is a suitable site area for onsite disposal.
- 10.22 The purpose of the assessment under SUB-S4 is to determine that there is a suitable site area available on the proposed lot.
- 10.23 Stipulating a specific minimum lot size in SUB-S1.4 does not implement SUB-P15 for an applicant to demonstrate a suitable site area for on-site disposal in an area less than the minimum, unless a non-complying consent is sought (SUB-R3).
- 10.24 A proposal that is consistent with SUB-P15 should not be required to go through a non-complying resource consent process.
- 10.25 In my opinion, it will be up to the subdivision developer to demonstrate that the proposed lots can be adequately serviced by OSWM system and obtain resource consent from Environment Canterbury.
- 10.26 The s42A Report (7.1.27) considers that the 2ha minimum lot size has been chosen based on rural character and amenity grounds as opposed to being large enough to result in permitted activity status for on-site waste water treatment and disposal under the regional planning provision.
- 10.27 If provision of OSWM disposal is not a driver for the 2ha minimum lot requirement then an assessment should determine if 2ha is appropriate for other reasons.
- 10.28 The Timaru District Growth Management Strategy 2045 (GMS) indicates that rural residential lots are 0.5ha or greater (i.e.5000m<sup>2</sup>).
- 10.29 To achieve the yields anticipated in the GMS would require a substantially larger area for rural lifestyle than provided for in the GMS if sites require a minimum lot size of 2ha.

- 10.30 The CRPS in the Principal reasons and explanation for Policy 5.3.1 states:
- Rural residential development is typified by clusters of small allotments usually in the size range up to 2.0ha principally zoned for residential activity.*
- 10.31 Therefore, the CRPS anticipates that rural residential sites will be smaller than a minimum of 2ha.
- 10.32 RLZ-R2 of the PTDP for Residential units and minor residential units has a permitted activity condition that the minimum site area of 5000m<sup>2</sup> unless the site existed before 22 September 2022.
- 10.33 This requirement is consistent with the GMS but conflicts with SUB-S1.4.
- 10.34 Sec 7 b) of the RMA requires the efficient use and development of natural and physical resources.
- 10.35 In considering a rural lifestyle development the need to provide efficient and optimal use of land should be an important consideration to ensure efficiency in terms of infrastructure and transport, limiting the fragmentation of the rural land resource and reduction in productivity.
- 10.36 There needs to be flexibility to be able to design developments around the nature of the land, rather than meet an arbitrary minimum lot size of 2ha. For instance, a development designed around contours and optimum access may result in lots less than 2ha and so would require a non-complying consent, yet seeking efficiency in the development design.
- 10.37 In my opinion, it is preferable to focus on the most appropriate configuration for a development to ensure that the ensuing environment meets the objectives and policies of the plan.
- 10.38 The CRPS anticipates 'clusters of small allotments' and concentration of rural residential development, rather than a more dispersed pattern of development that would result from having a larger minimum lot requirement.
- 10.39 The location of many of the new RLZ in the PTDP are adjacent to urban areas where there may already be development occurring rather than greenfield development. As such the character of the area is already providing a transition from urban to rural which will be enhanced by the RLZ.

- 10.40 The s42A Report (7.5.46) considers that RLZ located close to existing urban centres allows for smaller allotment sizes such as 5000m<sup>2</sup> to be absorbed compared to RLZ further from urban centres.
- 10.41 Such an approach could be reflected in the plan by differentiating minimum lot size dependent on the proximity of the RLZ to an urban area.
- 10.42 Given the discussion above regarding the appropriateness of using OSWM as a determinant for lot size I consider that RLZ adjacent to urban areas should have a minimum lot size of 5000m<sup>2</sup> regardless of provision of sewer reticulation, as that matter will be assessed as part of the resource consent application for the development.
- 10.43 I consider this is to be more sustainable and efficient use of the natural and physical resource while providing housing choice for those who seek to live in a rural environment.
- 10.44 I seek that SUB-S1.4 (4) is amended as follows:

In areas in proximity to urban areas, 5000m<sup>2</sup> if there is a sewer connection to each residential lot, otherwise

In any other areas, 2ha.

## **11. CONCLUSION**

- 11.1 This evidence addresses submissions and further submission points relating to subdivision provisions for the RLZ.
- 11.2 I support a change to SUB-S1.4 (4)
- In areas in proximity to urban areas, 5000m<sup>2</sup> if there is a sewer connection to each residential lot, otherwise 2ha.
- In any other areas, 2ha
- 11.3 Such a provision would better provide for rural lifestyle development that gives effect to the CRPS, is not inconsistent with the Regional Land and Water Plan and provides for an efficient use of the land resource and limits effects on primary production capacity.

**Lynette Wharfe**

**23 January 2025**

