

**BEFORE INDEPENDANT HEARING COMMISSIONERS
APPOINTED BY THE TIMARU DISTRICT PLAN**

UNDER: the Resource Management Act 1991

IN THE MATTER OF: Submissions and further submissions in
relation to Timaru Proposed District Plan

Hearing Stream G

**SECTION 32AA EVALUATION REPORT
ON BEHALF OF
WAITUI DEER FARM LIMITED (SUBMITTER NUMBER 19)**

Dated: 30 July 2025

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1. Introduction

This report has been prepared in accordance with Section 32AA of the Resource Management Act 1991 (**RMA**). Section 32AA requires a further evaluation of any changes made to a proposed policy statement, plan, or plan change after the initial Section 32 evaluation. Section 32AA(1)(b) states that the further evaluation must be undertaken in accordance with sections 32(1) to (4), while section 32AA(c) requires that the level of detail must correspond to the scale and significance of the changes.

This assessment relates to the following:

- **Proposed District Plan Review – Hearing G – Submitter 19 – Waitui Deer Farm Limited**
- **Timaru District Council**
- **Date of Assessment: 30 July 2025**

2. Purpose of the Further Evaluation

Under Section 32AA, any changes made to a proposed plan or plan change must be evaluated to determine:

- Whether the change is the most appropriate way to achieve the objectives of the proposal.
- Whether the change is effective and efficient.
- Whether the benefits and costs justify the change.
- Whether there is a risk of acting or not acting, if there is uncertain or insufficient information.

This report sets out that evaluation.

3. Description of the Change

The submission on behalf of Waitui Deer Farm Limited seeks to extend the 2 hectare Specific Control Area, as shown in the attached plan on the following page in Figure 1. The extension to the 2 hectare Specific Control Area would see approximately 47.5 hectares of additional land added, which would see an approximate yield of an additional 22 2 hectare sections. This area would be described as the Waitui Deer

Farm Specific Control Area. If the Specific Control Area is not expanded, the underlying zoning for the area will remain as the 10 hectare Specific Control Area, Rural Lifestyle Zoning.

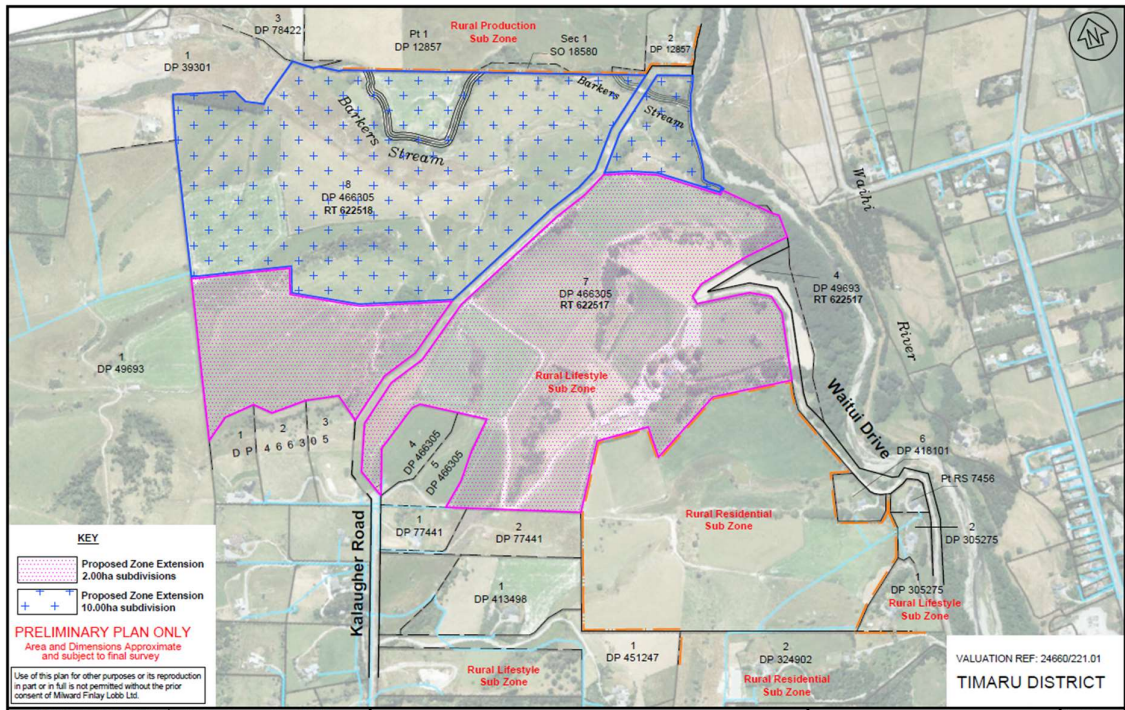


Figure 1 – Plan showing the proposed extension to the 2 hectare Specific Control Area provided with the original submission

In order to facilitate these changes planning mechanisms were offered at the time of the Hearing G hearings. These are as follows:

Future subdivision would be captured by Rule SUB-R3 and would be considered as a Restricted Discretionary Activity provided it met the applicable standards. SUB-R3 would require an additional reference to SUB-SX (see below) added to it.

Table 1 below describes the changes required to the Subdivision Standards that would be applicable to the Waitui Deer Farm Specific Control Area (additional provisions shown with underline):

Table 1: Proposed provisions for the Waitui Deer Farm Specific Control Area

SUB-S1	Allotment Size and Dimensions
4 Rural Lifestyle Zone	<p>If no development area plan is required, allotments must have a net site area no less than:</p> <ol style="list-style-type: none"> 1. 5000sqm for Lots 1 and 2 DP 444786 2. 2ha in the 2ha lot size specific control area; 3. 10ha in the 10ha lot size specific control area; and 4. in any other areas, 5000m2 if there is a sewer connection to each residential lot, otherwise 2ha. 5. <u>2ha in the Waitui Deer Farm Specific Control Area</u>
SUB-S7	Roads, cycleways and pedestrian access
3 <u>Waitui Deer Farm Specific Control Area</u>	<u>Prior to any subdivision application being made a Full ITA will be required to be submitted to Timaru District Council.</u>
SUB-SX	<u>Ecological Restoration Plan</u>
<u>Waitui Deer Farm Specific Control Area</u>	<u>At the time of subdivision application an ecological restoration plan will be submitted, along with method(s) to be used to inform future landowners of the ongoing maintenance requirements. Any landscaping or planting shall consist of indigenous plants native to the Talbot Forest Area.</u>

It is noted that in Long Bay-Okura Great Park Soc Inc v North Shore CC EnvC A078/08, the Court set out that “each proposed policy or method (including each rule) is to be examined having regard to its efficiency and effectiveness, as to whether it is the most appropriate method for achieving the objectives of the district plan taking into account:

- (a) the benefits and costs of the proposed policies and methods (including rules); and

(b) the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.”

In this instance the provisions are assessed in the applicable section of the Proposed District Plan (**PDP**) Objectives analysis.

4. Evaluation of the Change

a. Appropriateness

Section 32(1)(a) requires that an evaluation must examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. No alterations are proposed to the PDP Objectives however as this is an amending proposal (as outlined in s32(3)) the provisions of the plan change must be evaluated against both the objectives of the proposed plan change (if there are any), along with the objectives of the existing plan where these are relevant. As the underlying zoning in the Operative District Plan is the Rural 4A Zone, and the Proposed District Plan reflects this Rural 4A Zone with the Rural Lifestyle Zone 2 hectare and 10 hectare Specific Control Areas an assessment of the Operative District Plan Objectives is not considered relevant. Accordingly an assessment of the Proposed District Plan Objectives is provided on the following page in Table 2.

Table 2: Assessment of PDP Objectives (separated out due to the staged nature of the Hearings process)

PDP Objective ¹	Assessment
<p>SD-O1 – Residential Areas and Activities</p> <p>i. There is sufficient residential development capacity in existing and proposed urban areas to meet demand and household choice, provided through:</p> <ul style="list-style-type: none"> a. the use of existing zoned greenfield areas; b. a range of densities in existing urban areas; and c. higher residential densities in close proximity to the Timaru and Geraldine town centres, and Highfield Village Mall; d. the new Future Development Areas identified for the General Residential Zone. <p>ii. limited rural lifestyle development opportunities are provided where they concentrate and are attached to existing urban areas, achieve a coordinated pattern of development, avoid significant reverse sensitivity effects on existing and permitted rural activities, recognises the productive capabilities of the soils and location and are capable of efficiently connecting to reticulated sewer and water infrastructure;</p>	<p>The proposed change is within the Rural Lifestyle Zone and is situated outside of the urban area.</p> <p>The proposal is within an existing Rural Lifestyle Zone, therefore rural lifestyle development is anticipated, with the extension adjacent to the existing 2 hectare Specific Control Area, and also adjacent to small lifestyle allotments of a similar 2 hectare size. As the proposed change is within the Rural Lifestyle Zone overlay it is considered that any reverse sensitivity effects have already been considered at the time of Plan Change 17 (which created the original Rural 4A Zone). The site is not classified as Highly Productive Land as per the National Policy Statement for Highly Productive Land. There are options available for the connection of the site</p>

¹ The Objectives cited are those that were proposed on 22 September 2022 and updated on 5 April 2024 with recommended amendments.

<ul style="list-style-type: none"> iii. limited residential opportunities are maintained in existing rural settlements, subject to adequate servicing; and iv. the location of new residential areas and activities avoids creating significant conflict with incompatible zones and activities. 	<p>with infrastructure such as the Te Moana Water Scheme and there are a number of potential options available for wastewater management.</p> <p>The proposal is not within a rural settlement.</p> <p>The proposal does not create a new residential area.</p>
<p>SD-O2 – The Natural and Historic Environment The District's natural and historic environment is managed so that:</p> <ul style="list-style-type: none"> i. the health and wellbeing of the community are recognised as being linked to the natural environment; ii. an integrated management approach is adopted that recognises that all parts of the environment are interdependent; iii. the natural character of the coastal environment, wetlands and waterbodies is preserved and protected from inappropriate subdivision, use, and development; iv. important landscapes and features are protected from inappropriate subdivision, use, and development; v. indigenous biodiversity is maintained and enhanced and restored where necessary so that there is at least no overall loss; 	<p>This is acknowledged through the Geraldine Downs Walking and Cycling Tracks which are already noted on the Proposed Timaru Plan e-plan.</p> <p>This is acknowledged through the matters that need to be considered at the time of future subdivision and development application.</p> <p>The natural character values of the Waihi River and surrounding waterbodies will be enhanced through a future ecological restoration plan.</p> <p>The site is subject to the Visual Amenity Landscape overlay that is associated with the Geraldine Downs, however this has not precluded 2 hectare sites from being considered appropriate within the area.</p>

<ul style="list-style-type: none"> vi. significant indigenous vegetation and significant habitats of indigenous fauna are identified and their values recognised, protected, enhanced, and where ecological integrity is degraded, restored; vii. the life-supporting capacity of ecosystems and resources is safeguarded for future generations; viii. the important contribution of historic heritage to the District's character and identity is recognised, and historic heritage and its values are protected from inappropriate subdivision, use, and development. 	<p>There are Significant Natural Areas that are identified on site, however these are already situated within the existing 2 hectare Specific Control Area (with a very small part of 724f sitting within the 10 hectare Specific Control Area) and the proposed extension will not see a change to the way this area would be managed through the existing District Plan provisions. The report that was issued by Wildlab presents an opportunity to restore these areas and extend the indigenous vegetation areas available with a planting plan requirement at the time of subdivision application.</p> <p>There are no historic heritage matters that are affected by the proposal.</p>
<p>SD-O3 – Climate Change</p> <p>The effects of climate change are recognised and an integrated management approach is adopted, including through:</p> <ul style="list-style-type: none"> i. taking climate change into account in natural hazards management; ii. enabling the community and activities to adapt to climate change; iii. encouraging efficiency in urban form and settlement patterns and encouraging activities which reduce carbon emissions; and 	<p>There is sufficient space available on site for there to be building platforms developed outside of hazard areas. The proposal will not stop the community from being able to adapt in the future.</p> <p>The area is connected to the Geraldine Urban settlement and will see a modest extension to an area that is already considered acceptable for 2 hectare sections.</p>

iv. recognising the important role renewable electricity plays in achieving New Zealand's net carbon zero target by providing for renewable electricity generation, electricity transmission and electricity distribution.	The proposal will not negatively impact on renewable electricity.
<p>SD-O4 – Natural Hazards</p> <p>Natural hazards risks are addressed so that:</p> <ul style="list-style-type: none"> i. areas subject to natural hazards and risk are identified; ii. development is avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable; and iii. for other areas, natural hazards risks are appropriately mitigated. 	<p>The areas are known and have been accounted for. There are no areas that have been identified where development is considered to be unacceptable due to natural hazard risk.</p> <p>There is sufficient space available to develop building sites away from hazard areas.</p>
<p>SD-O5 – Mana Whenua</p> <p>The mana whenua status of Kāti Huirapa is recognised and their historic and contemporary relationship with the District's land, water bodies and wetlands, coastal environment, and indigenous species is recognised and provided for by ensuring:</p> <ul style="list-style-type: none"> i. mahika kai resources and habitats of indigenous species are sustained and opportunities for their enhancement or restoration are encouraged; ii. the health of water body and wetland environments is protected from adverse effects of land use and development; iii. the values of identified sites and areas of significance to Kāti Huirapa are recognised and protected; 	<p>The site is adjacent to the Waihi River which is identified as a Site and Area of Significance to Maori (SASM) in the PDP (Identifier: SASM-20). Access to the River will not be adversely affected by the rezone, and there are existing esplanade strips that will allow for future access to be achieved. It is also noted that the PDP provides for Walking and Cycling tracks which allow for public access to the area once established.</p> <p>A key concern of mana whenua is the impact of additional development on the health and mauri of the Waihi River, particularly when this development leads to a potential increase in wastewater and stormwater discharge to ground. However, the rezone will see</p>

<ul style="list-style-type: none"> iv. where appropriate, Kāti Huirapa retains, and is able to enhance access to their sites and areas of significance; v. Māori reserve lands are able to be used by Kāti Huirapa for their intended purposes; vi. Kāti Huirapa are able to carry out customary activities in accordance with tikanga; vii. Kāti Huirapa are actively involved in decision making that affects their values and interests in these matters and are able to exercise their kaitiakitaka responsibilities. 	<p>farming practices be retired which will have a beneficial impact on the land and waterways, with residential development being a more passive use of the land. The proposed planting requirements will also see a benefit to the flora and fauna and the hydrology of the surrounding environment which recharges the Waihi River.</p>
<p>SD-O8 – Infrastructure Across the District:</p> <ul style="list-style-type: none"> i. improved accessibility and multimodal connectivity is provided through a safe and efficient transportation network that is able to adapt to technological changes; ii. the provision of new network infrastructure is integrated and co-ordinated with the nature, timing and sequencing of both new development and the growth of existing development; iii. drinking water supplies are protected from the adverse effects of subdivision, use and development; 	<p>The requirement to have an Integrated Traffic Assessment at the time of subdivision consent will also ensure that any development will be appropriate at the time of future development. The timing of the assessment will also mean the assessment is responding to the conditions as they exist at the time of subdivision as there can be a delay in between rezoning and development of a site.</p> <p>The same notion applies to the modelling of the water supply which will be required at the time of future subdivision, and if there is not sufficient capacity within the Te Moana scheme this will need to be addressed by alternative means that do not adversely impact network infrastructure or the environment.</p>

iv. the benefits of regionally significant infrastructure and lifeline utilities are recognised and their safe, efficient and effective establishment, operation, maintenance, renewal and upgrading and development is enabled while managing adverse effects, including reverse sensitivity effects, appropriately.	There are no impacts on regionally significant infrastructure and lifeline utilities.
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PDP Objective ²	Assessment
TRAN-O1 Land Transport Infrastructure Land transport infrastructure that is well-connected, integrated, accessible, supports low emissions and which: <ul style="list-style-type: none"> i. is safe, efficient and effective for all transport modes; ii. meets and is responsive to current and future needs, including projected population growth; iii. aligns and integrates with the timing and location of urban development; iv. promotes multi-modal transport options, including the use of active transport and public transport, and reduces dependency on private motor vehicles; v. supports consolidated, well designed and sustainable growth in and around existing urban locations; vi. encourages sustainable economic development; and vii. provides parking opportunities in an efficient, functional and sustainable manner and to avoid adverse effects on the environment. 	The proposed Full Integrated Traffic Assessment will manage these matters at the time of subdivision where it will analyse the appropriateness of the density of the subdivision within the context of the transport network that exists at the time.

² The Objectives cited are those that were proposed on 22 September 2022 and updated on 11 December 2024 with recommended amendments.

SASM-O2 – Access and Use Kāti Huirapa’s access to, and use of, resources and areas of cultural value within identified Sites and Areas of Significance to Kāti Huirapa, for customary use and cultural purposes, is maintained and, where appropriate, enhanced	The proposed Specific Control Area extension will not see any changes to the access that Kāti Huirapa have to the Waihi River, with the development of existing esplanade strips providing future access for additional access to the Waihi River.
SASM-O3 – Protection and Sites and Areas of Significance The values of identified areas and sites of significance to Kāti Huirapa are recognised and protected from inappropriate subdivision, use and development.	There are benefits that can arise from the extension of the 2 hectare Specific Control Area, particularly surrounding the retiring of farm land and the opportunity to carry out ecological restoration of the property.

PDP Objective ³	Assessment
ECO-O1 – Protection of significant indigenous biodiversity Significant indigenous vegetation and significant habitats of indigenous fauna across the District are protected.	The identified Significant Natural Areas on the property fall within the existing 2 hectare Specific Control Area, apart from one small part of SNA 724f, however the extension of the 2 hectare Specific Control Area will not threaten these areas any further.
ECO-O2 – Maintenance and enhancement of indigenous biodiversity The indigenous biodiversity of the District is maintained or enhanced.	The potential for ecological restoration of the site is able to be realised through District Plan provisions which will see the indigenous biodiversity of the District be enhanced.
NFL-O2 – Visual Amenity Landscapes	The 2 hectare Specific Control Area extension sees an activity that is already able to be carried out in the Visual Amenity Landscape of the Geraldine Downs be carried out

³ The Objectives cited are those that were proposed on 22 September 2022 and updated on 9 October 2024 with recommended amendments.

The landscape character and visual amenity values of the visual amenity landscapes of the Timaru District are maintained or enhanced.	in a slightly higher density while still integrated with the 2 hectare Specific Control Area that is already anticipated in the Rural Lifestyle Zone.
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PDP Objective ⁴	Assessment
PA-O1 – Public Access Public access to and along the coastal marine area and the margins of identified wetlands and rivers is maintained and enhanced, and only restricted where appropriate.	The 2 hectare Specific Control Area extension will not see any adverse impact on the public access that is expected alongside the Waihi River. There are esplanade strips that have already been provided where applicable, the development of these will be carried out through a Council derived process in the future.

PDP Objective ⁵	Assessment
RLZ-O1 – Purpose of the Rural Lifestyle Zone The Rural Lifestyle Zone provides for areas adjoining Timaru, Temuka, Geraldine and Pleasant Point used predominantly for a residential lifestyle within a rural environment on lots smaller than those of the General rural zone, while enabling compatible primary production to occur.	The 2 hectare Specific Control Area extension will see this activity occurring within the Rural Lifestyle Zone.
RLZ-O2 – Character and qualities of the Rural Lifestyle Zone The character and qualities of the Rural Lifestyle Zone comprise: <ul style="list-style-type: none"> i. natural character and openness; and 	

⁴ The Objectives cited are those that were proposed on 22 September 2022 and updated on 24 March 2025 with recommended amendments.

⁵ The Objectives cited are those that were proposed on 22 September 2022 and updated on 19 June 2024 with recommended amendments.

<ul style="list-style-type: none"> ii. residential buildings, trees and landscaping that integrate with the natural and rural character of the area; and iii. a high level of amenity, outlook, access to sunlight and environmental quality; iv. a pastoral landscape and the presence of compatible primary production; and v. a coordinated pattern of development at a density that is capable of efficiently connecting to sewer and water infrastructure. 	<p>2 hectare sections still allow for the natural character of the Rural Lifestyle Zone with sufficient space for landscaping and residential buildings on site. The location and topography of the site allows for there to be a high level of amenity and environmental quality, particularly when this is enhanced with an ecological restoration plan. The site is surrounded by rural lifestyle sections and small scale primary production activities and an extension of the 2 hectare Specific Control Area is in keeping with this surrounding environment.</p> <p>The 2 hectare Specific Control Area extension has options for water and wastewater disposal that are best addressed at the time of future subdivision in terms of the Canterbury Land and Water Regional Plan.</p>
<p>RLZ-O5 – Integrated Development Rural lifestyle development is integrated with the environment and appropriate infrastructure.</p>	<p>The proposed 2 hectare Specific Control Area extension is proposed to be serviced by the level of infrastructure required by the PDP for a 2 hectare allotment.</p>

On the basis of the above assessment, I conclude that the Proposal is consistent with the PDP Objectives.

Section 32(1)(b) requires examination of whether the proposed rezoning provisions are the most appropriate way of achieving the District Plan objectives. Where appropriate the proposed provisions have been commented on within Table 2.

b. Effectiveness and Efficiency

The Guidance on Section 32 Assessments provided by the Ministry for the Environment defines effectiveness and efficiency in the following way:

Effectiveness assesses the contribution new provisions make towards achieving the objective, and how successful they are likely to be in solving the problem they were designed to address.

Efficiency measures whether the provisions will be likely to achieve the objectives at the lowest total cost to all members of society, or achieves the highest net benefit to all of society. The assessment of efficiency under the RMA involves the inclusion of a broad range of costs and benefits, many intangible and non-monetary.

In assessing the benefits and costs of the Proposal, the following options are considered:

- a) Option 1: Retain the proposed zoning with the 2 hectare and 10 hectare Specific Control Area in their current location (The Status Quo);
- b) Option 2: Extend the boundary of the 2 hectare Specific Control Area in the manner described in the original submission;
- c) Option 3: Deferred Zoning where Option 2 is achieved once specific provisions are met

To date, s32 case law has interpreted 'most appropriate' to mean "suitable, but not necessarily superior". This means the most appropriate option does

not need to be the most optimal or best option, but must demonstrate that it will meet the objectives in an efficient and effective way.⁶

A cost benefit analysis of the three options is provided on the following page in Table 3.

⁶ Rational Transport Soc Inc v New Zealand Transport Agency HC Wellington CIV-2011-485-2259, 15 December 2011

c. Costs and Benefits

Table 3 – Cost and Benefits of the Options Available

		Benefits	Costs
Environmental	Option 1	<ul style="list-style-type: none"> • Maintains the rural lifestyle character in a less dense layout • Reduced impact on groundwater through less wastewater and stormwater discharge being produced 	<ul style="list-style-type: none"> • No requirement to carry out any additional landscaping. Sites can be developed with no additional requirements over and above current PDP requirements
	Option 2	<ul style="list-style-type: none"> • Opportunity for improvement and enhancement from an ecological perspective • Gives effect to an existing Rural Lifestyle Zone without the loss of any further General Rural Zone Land • More farm land is retired 	<ul style="list-style-type: none"> • Loss of larger rural lifestyle sections • Impact on rural outlook and character
	Option 3	<ul style="list-style-type: none"> • The benefits are the same as Option 2 	<ul style="list-style-type: none"> • The costs are the same as Option 2
Social	Option 1	<ul style="list-style-type: none"> • No social benefit recognised 	<ul style="list-style-type: none"> • Does not contribute to a range of choices available to those wanting to develop in the Rural Lifestyle Zone
	Option 2	<ul style="list-style-type: none"> • Potential option to develop internal access tracks for the sole benefit of property owners along tributaries and gullies. • Can contribute to more use of walking tracks developed within the Geraldine Downs with more people in the area. 	<ul style="list-style-type: none"> • Increased numbers of people utilising Waitui Drive for recreational purposes (i.e. accessing walking tracks) creating tension with existing landowners

	Option 3	<ul style="list-style-type: none"> • Same benefits as Option 2 	<ul style="list-style-type: none"> • Same costs as Option 2
Economic	Option 1	<ul style="list-style-type: none"> • Lesser impact on Council infrastructure which has a flow on effect to required upgrades and maintenance 	<ul style="list-style-type: none"> • No additional development contributions or increased rateable income for Council • Does not contribute to housing demand/supply
	Option 2	<ul style="list-style-type: none"> • Increase in rateable income able to be realised by Council • More sections available to the market helps with housing affordability as there is less of a margin between supply and demand • More short-medium term employment opportunities during construction 	<ul style="list-style-type: none"> • Economic cost of developing the infrastructure required to service more allotments.
	Option 3	<ul style="list-style-type: none"> • The development is carried out at a time where there is market demand and the developer is in a position to carry out the development 	<ul style="list-style-type: none"> • The costs are the same as Option 2
Cultural	Option 1	<ul style="list-style-type: none"> • Limited impact of wastewater and stormwater discharge on the Waihi River 	<ul style="list-style-type: none"> • Farming practices continue to impact the Waihi River
	Option 2	<ul style="list-style-type: none"> • Farming practices are removed from the site on a more widespread scale • The ecological restoration plan provides benefits to the mauri of the Waihi River among other benefits to the region 	<ul style="list-style-type: none"> • Increased wastewater discharge and stormwater discharge systems which may have a detrimental impact on the Waihi River
	Option 3	<ul style="list-style-type: none"> • Same benefits as Option 2, at a later time 	<ul style="list-style-type: none"> • Same costs as Option 2

Conclusion: Option 2 is the preferred option as the benefits outweigh the costs. The costs outweigh the benefits in respect of Option 1. Option 3 provides an alternative relief that provides the same benefits as Option 2, albeit at a delayed time when it is appropriate to develop the site at a higher density.

The Proposal, incorporating the rezoning and recommended amendments to the PDP provisions, is considered to be the most efficient and effective means of achieving the proposed relief and objectives of the PDP. The Proposal contributes to the diversity of residential offerings in the district and provides economic and social benefits, while appropriately maintaining the amenity of surrounding rural residential and rural zones and contributing to a well-functioning urban environment.

d. Risk of Acting or Not Acting

The proposed extension to the 2 hectare Specific Control Area does not create any fundamental risks that cannot be appropriately managed by mechanisms within the RMA and the PDP. The supporting information from Wildlab confirms the suitability of the Site for additional 2 hectare rural lifestyle development and that there is significant opportunity that comes from the rezoning. This information has been provided at a level of detail that is appropriate to a rezoning proposal, however further detailed technical engineering investigation on the development of the site has not yet been undertaken in terms of transport and water modelling. This creates a risk in relation to acting, however it is small as a resource consent process will be required in respect of subdivision and the proposed provisions will capture this modelling at this time where it will respond to the environment at the time of development as opposed to this conceptual stage. The further assessment required through the resource consent process enables appropriate management of this risk.

Risks associated with not acting includes shortfall of appropriate rural lifestyle land being available in the Timaru District surrounding the Geraldine township, and by utilising this site it negates the need for Council to carry out further plan change processes in the future if Future Development Areas are proposed to be developed. As this property is also held within the ownership of one entity it also means that it is a situation between one developer and Timaru District Council, as opposed to other identified Future Development Areas which will require significant coordination across multiple landowners to allow development to occur.

5. Summary and Conclusion

The further evaluation under Section 32AA of the RMA concludes that the proposed changes to the 2 hectare Specific Control Area within the Rural Lifestyle Zone adjacent to the Geraldine township associated with the Waitui Deer Farm are:

- Appropriate to achieve the relevant objectives.
- More effective and efficient than the notified 2 hectare Specific Control Area.
- Supported by a sound assessment of costs, benefits, and risks.

Accordingly, it is recommended that the changes be adopted in the final decision.



Melissa Jane McMullan

30 July 2025