

**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
G Growth

**INFORMATION TO SUPPORT TIMING OF REZONING OF FDA11
FOR D & S PAYNE (SUBMITTER 160 AND FURTHER SUBMITTER 160)**

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28 FEBRUARY 2025

Summary

This information is provided to assist the s42A Report writer in assessing submission relating to Hearing G Growth.

The information includes:

1. Background
2. Description of the FDA11 area
3. Environment values
4. Infrastructure
5. Statutory framework
6. Constraints on use of FDA11 as GRUZ for further 10 years
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Appendix:

Appendix 1: Maps showing FDA11 lots numbered and sizes and Table 1 setting out lots sizes and locations

Appendix 2: Photos of riparian planting on Peelview Orchard property

Appendix 3: Geraldine Protected Community Water Zone

Appendix 4: Accessways to Peelview Orchard from Bennett Road

Appendix 5a: Photos of Peelview Orchard during 2021 Flood Event

Appendix 5b: Photos of Peelview Orchard during 2023 Flood Event

Appendix 6: NPS-HPL assessment, Stuart Ford, The AgriBusiness Group

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1. Background

Additional information is requested by Timaru District Council (Council) from submitters seeking changes to zonings in response to the Section 42A Report for Hearing G - Rezoning to Accommodate Growth: Preliminary Report – Information to assist in assessment.

This information and assessment has been written by Lynette Wharfe of The AgriBusiness Group for David and Susanne Payne.

Submitters 160 David and Susanne Payne have requested that FDA11 be rezoned Rural Lifestyle (RLZ) through the district plan process. The Paynes are also part of a group of landowners in the FDA11 area that have jointly submitted to have the area rezoned as RLZ (Submission 108).

The Preliminary s42A Report identifies the Paynes as seeking FDA11 Templer Street to be rezoned immediately to Rural Lifestyle and for the FDA overlay and rules to be removed.

The Payne's property is also included in the Memo dated 22 January 2025 (received 27 January 2025) regarding application of NPS-HPL on zoning requests.

This information supports the rezoning request.

The Council has already identified that FDA11 is suitable for rural lifestyle development by including it for future development as rural lifestyle. Therefore, the need to justify the appropriateness of the area for rural lifestyle is not in contention. The key matter is the timing of the zoning change, with the Paynes seeking an immediate RLZ zoning rather than a deferred FDA with a 10 year plus timeframe.

2. Description of the FDA11 area

FDA11 is an area of 56.134ha defined by Main North Rd, Templer St and Bennett Rd and is contiguous with the Geraldine township urban area.

As shown by Appendix 1 (Figure 3 and Table 1), the area is already in 38 titles, ranging in size from 809 sqm to 87940sqm. This equates to an overall average lot size of 1.47ha. Seven of the 38 properties are over 2ha. The other 31 lots that are less than 2ha have an average lot size of 0.7067 ha.

The Payne's property at 20 Bennett Road is Lot 2 DP345462 and at 8.794 ha is the largest lot within FDA11.

The current zoning of FDA11 in the Operative District Plan is a mixture of Rural 1 and Rural 2. The proposed zoning in the Proposed Timaru District Plan is General Rural Zone (GRUZ) with the FDA11 overlay for Rural Lifestyle beyond 10 years.

While the area is currently zoned as a mix of Rural 1 and Rural 2 it has a level of development that is representative of rural lifestyle with an average lot size of 1.47ha.

The area is well serviced for road access with Main North Road, Bennett Rd and Templer St ringfencing the block and providing access to all sides of the area. Geraldine township is a flat seven minute bike ride or a 15 minute walk away. The Payne's property currently has three access points onto Bennett Rd.

Some commercial development has occurred within the FDA11 block. For instance, the Geraldine Orchard Farm Shop and Café is located at 56 Main North Rd within FDA 11 (Number 27 of the Figure 3, Appendix 1). Other commercial activities operate on the other side of the Main North Road from FDA 11, including Four Peaks Transport and Brett Horrell Building contractors. Gateway Vets at 5 Woodbury Road is the closest commercial operator to the Payne's property.

The block is serviced by the both the Te Moana water supply and town water supply, Figure 1 below.

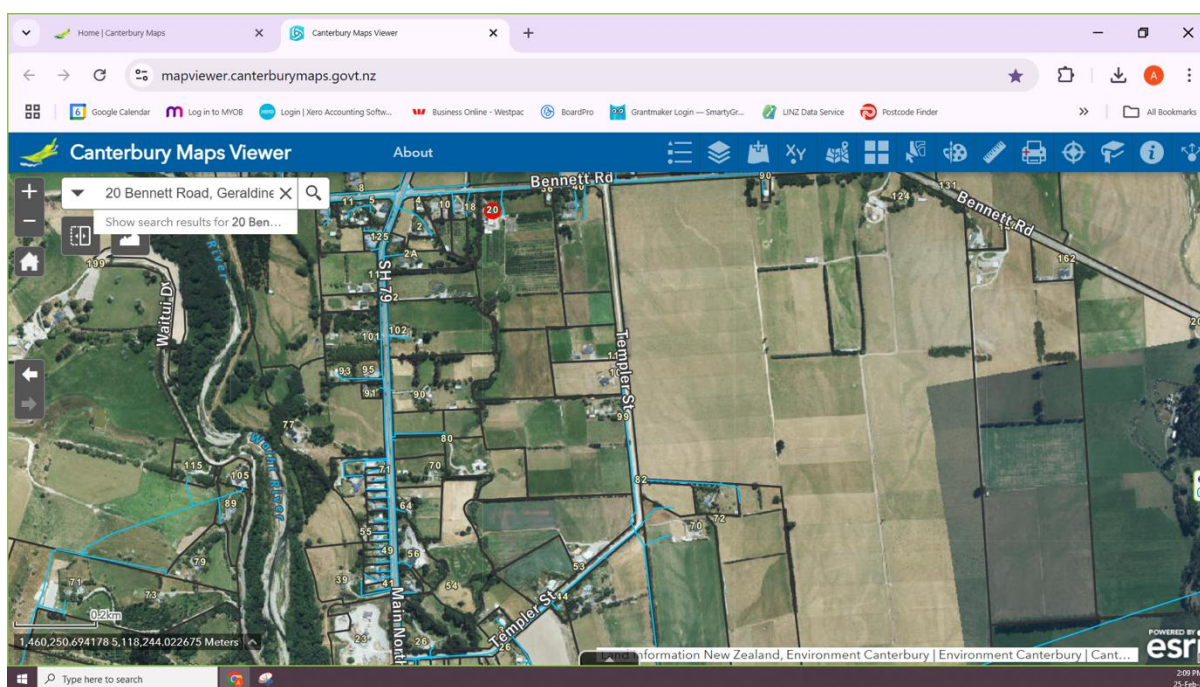


Figure 1: The existing service area of water supply surrounding FDA 11 (in blue).

The FDA11 area has changed incrementally over time with a range of subdivisions and the realignment of titles being undertaken. When the Paynes brought the property in 1995 there were other operational orchard blocks within the suggested FDA11 area. Lots 16, 17, 19 and part of 26 (refer Figure 3, Appendix 1) were in fruit production comprising an area of 10 ha plus the Payne's 10 ha. There was also an export pack house servicing the orchards but this closed in 1999. A 10 ha orchard was considered to be economically viable at that point in time, often being family run businesses.

The only remaining orchard area now is 1.5 ha on the Payne property which is under considerable site constraints due to the surrounding development that has occurred over the last 10+ years.

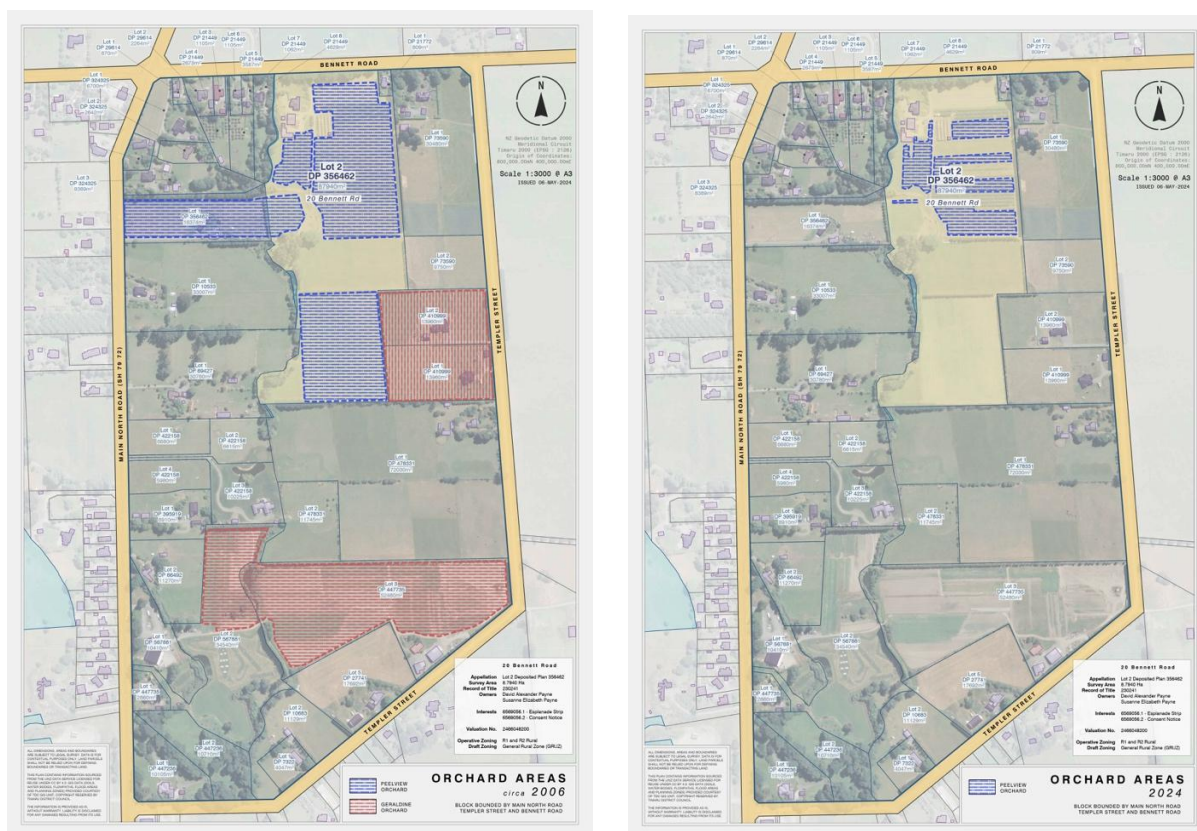


Figure 2a and 2b: Comparison of orchard areas between 2006 and 2024, with 2b being the uneconomic remnant orchard area currently at 20 Bennett Road (the Payne's property).

While the FDA11 area is in 38 titles it has retained its openness with residential buildings, trees and landscaping shaping the environment. It is anticipated that there would be no impacts on this type of amenity should further subdivision occur when zoned RLZ. A rural lifestyle zoning would simply reflect the activities and level of development that is already present in the area.

The Paynes have undertaken significant riparian planting along Raukapuka Stream where they have access to its margins (see Appendix 2). There is a registered covenant in place for this riparian area between TDC and the Paynes. There is potential for further planting as part of any future development of the area to further enhance the environment. The path of the Raukapuka Stream where it enters the property as springs is shown on the Drinking Water Protection Zone (see Appendix 3, Figure 4) but the Drinking Water Protection Zone does not extend over the property.

The FDA11 area is flat land so minimal earthworks would be required for establishing building platforms. (Other RLZ sites, such as the Geraldine Downs, are sloping sites that can require substantial earthworks to establish a suitable building platform at significant extra cost.)

The Geraldine urban area extends to Templer Street so the FDA11 block is attached to the urban area at Templer St. The three roads (Main North Road, Templer Street and Bennett Road) also provide a clear and defensible boundary between urban and rural activities.

3. Environment Values

Landscape and natural character

There are no landscape or natural character notations for FDA11 on the maps for the PTDP. Riparian planting has been undertaken along the Raukapuka Stream which enhances natural character. It would be anticipated that this planting would be protected through any development proposals.

Amenity values of the FDA11 area, if rezoned from GRUZ to RLZ, will not adversely affect the RLZ as the area has been effectively functioning as a rural living environment for some time and that character would continue through any new development.

Biodiversity constraints

There are no biodiversity notations for FDA11 on the maps for the PTDP.

Cultural and/ or heritage values

There are no cultural or heritage notations or SASM for FDA11 on the maps for the PTDP.

Reverse sensitivity/ incompatible land uses

The effect of rezoning FDA11 to RLZ will have a positive impact in reducing potential for reverse sensitivity as Peelview Orchard would seek to develop the land and remove remaining orchards thereby reducing potential for spray and noise complaints. This is considered to be a positive benefit of the rezoning.

4. Infrastructure requirements for RLZ

Water supply

The Te Moana water supply is available in the area and the Paynes have 8 units (1000cm per day per unit) of guaranteed supply from this water scheme. The Geraldine town water supply is also reticulated up Bennett Rd beyond the Payne's property – refer Figure 1 above.

Wastewater

Wastewater would be disposed of by On-site waste water management (OSWM) through consent from ECAN. ECAN has recently issued consents for 2 and 2B Bennett Rd (lot sizes 6700sqm and 2942 sqm). It is also noted that the property is not within the Geraldine Drinking Water Protection Zone which assists with the pathway for consent (Refer Appendix 3, Figure 4).

Stormwater

Stormwater will be managed on site in accordance with the requirements of the Canterbury Land and Water Regional Plan.

Transport

FDA11 is serviced by Templer St, Bennett Rd and Main North Rd and its proximity to Geraldine provides for efficient use of services. Access to the Payne's property is from Bennett Rd with three existing access points on a straight, low-traffic road with clear sight lines. Refer to photos in Appendix 4.

Natural hazards

The Planning Maps in the PTDP identify that FDA11 is within a Flood Assessment Area which would need to be taken into account for future development. However the Paynes note that even in the huge rainfall flood event in May 2021 (a 1 in 200 year AEP event), which had a significant impact on Mid and South Canterbury, the property was not flooded. Raukapuka Stream swelled to the highest levels seen by the Paynes during their ownership of the property but none of the property was inundated by flood waters (as shown by the attached photographs Appendix 5a).

In a subsequent event in July 2023, the property again was not flooded (Refer to photos Appendix 5b). There was significant concern at the time that this event was going to overtop the stop bank at the south of Geraldine and inundate the recent residential development at Strawberry Fields (which sits under the stop banks within metres of the Waihi River).

5. Statutory Framework

The National Policy Statement for Highly Productive Land (NPS-HPL)

The National Policy Statement for Highly Productive Land (NPS-HPL) is relevant to the Payne's property.

An assessment has been undertaken by Stuart Ford of The AgriBusiness Group (Appendix 6). The report determines that a rural lifestyle development immediately (not deferred by 10 years) on the Payne's property meets all the limbs of the clause 3.10 test in the NPS-HPL.

The National Policy Statement for Urban Development (NPS-UD)

The National Policy Statement for Urban Development (NPS-UD) is not relevant as it pertains to urban development, not rural lifestyle development and Geraldine is not an urban environment under the NPS-UD.

It is not considered appropriate that rural lifestyle land is included as contributing to a well-functioning urban environment to meet the NPS-UD because the purpose for the RLZ zone, as described in the National Planning Standards Zone Framework is a rural zone that provides opportunities for primary production.

Canterbury Regional Policy Statement (CRPS)

The Canterbury Regional Policy Statement (CRPS) provides direction for land use, infrastructure and growth in Chapter 5. Of particular relevance are:

- Objective 5.2.1 Location, Design and Function of Development (Entire Region)
- Policy 5.3.1 Regional growth (Wider Region)
- Policy 5.3.2 Development conditions (Wider Region)
- Policy 5.3.5 Servicing development for potable water, and sewage and stormwater disposal (Wider Region)

The CRPS provides a directive framework to the district council in terms of providing for rural lifestyle within the district plan.

CRPS Objective 5.2.1 seeks development that achieves consolidated, well designed and sustainable growth in and around existing urban areas.

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 and promotes a co-ordinated pattern of development.

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.

The policies are to be given effect in district plans.

Rezoning FDA11 to RLZ would give effect to the CRPS as it would provide for limited rural residential development attached to the existing urban area of Geraldine and enable development to occur in a more cohesive manner within the area compared to the ad hoc subdivision that has occurred under the Operative District Plan.

The Proposed Timaru District Plan (PTDP)

Strategic Directions

SD-O1 provides for limited rural lifestyle development opportunities to be provided where they concentrate and are attached to existing urban areas, achieve a co-ordinated pattern of development and are capable of efficiently connecting to reticulated sewer and water infrastructure.

This objective is subject to submission and decision, particularly the requirement for connection to reticulated sewer infrastructure, which is inconsistent with the CRPS and other provisions in the PTDP. The Paynes have addressed this issue in evidence to the Strategic Directions, Subdivision and Rural /Rural Lifestyle hearings.

FDA11 meets the direction in SD-O1:

- Concentrated in a clearly defined area with clearly defensible boundaries
- Attached to existing urban areas
- Connected to water infrastructure

Proposed District Plan Zone objectives and policies

The following analysis considers the relevant proposed objectives and policies in the General Rural Zone and the Rural Lifestyle zone to determine the applicability to the FDA11 area.

General Rural Zone:

Provision		Relevance to FDA11
GRUZ-O1	Purpose of zone is predominantly primary production	There is very little primary production undertaken within FDA11, and what little remains is severely compromised by constraints and reverse sensitivity
GRUZ-O2	Character and qualities are large allotments with large areas of open space Primary production activities which generate noise, odour	Allotments within FDA11 are an average size of 1.47ha so are not large. Minimal primary production occurs within FDA11
GRUZ-O3	Protecting primary production Land resource is not diminished by activities locating and protect primary production from sensitive activities.	The land resource is already diminished by activities locating in FDA11. Primary production already adversely affected by location of sensitive activities
GRUZ-P1	Primary production activities To allow ongoing productive use of land and maintain character and qualities of the GRUZ	Use of land for primary production in FDA11 is already compromised.
GRUZ-P2	Character and qualities of the GRUZ By providing for separation of sensitive activities	Current level of development within FDA11 precludes level of separation anticipated in policy
GRUZ-P5	Protecting primary production by managing location of sensitive activities to avoid adverse effects on primary production	Current level of development within FDA11 does not provide protection for primary production activities.
GRUZ-P8	Residential activities to avoid fragmentation of rural land for non-primary production activities and meets GRUZ-P5	Residential activities in FDA11 already fragment rural land so primary production cannot occur

It is evident that the land zoned GRUZ in FDA11 does not meet the relevant objectives and policies in the Proposed Plan. Therefore, it is inappropriate to zone the area as GRUZ as an interim measure.

Rural Lifestyle Zone:

Provision		Relevance to FDA11
RLZ-O1	Purpose of zone is predominantly for a residential lifestyle within a rural environment in areas adjoining Timaru, Temuka, Geraldine and Pleasant Point.	FDA11 is adjoining Geraldine and current activity is consistent with a residential lifestyle
RLZ-O2	Character and qualities are natural character and openness, residential buildings, trees and landscaping that integrate with area	FDA11 currently has residential buildings, trees and landscaping which integrate with the area
RLZ-O3	Protection from inappropriate activities that have significant potential adverse effects on the environment	The existing activities in FDA11 have an expectation of a rural lifestyle amenity and object to effects that are inconsistent with that amenity
RLZ-O4	Compatible and complimentary activities including commercial, community, health and emergency activities	Commercial activities already exist within FDA11
RLZ-O5	Integrated development with the environment and appropriate infrastructure	FDA11 is well serviced by a road network, electricity, phone and internet providers and water services.
RLZ-P1	Residential activities that: <ul style="list-style-type: none"> - Maintain character and quality of zone - Connected to reticulated drinking water supply 	New development within FDA11 could ensure that the character of the area is maintained, which has been functioning as a defacto rural living area for a number of years. Connection to reticulated drinking water supply is either through the Geraldine town water supply or the Te Moana scheme.
RLZ-P2	Primary production <ul style="list-style-type: none"> - Maintain character and quality of zone - Provides for ongoing productive use of land 	Zoning FDA11 as RLZ does not foreclose on opportunities for productive use that is compatible within the area.
RLZ-P3	Character and qualities maintained by: <ul style="list-style-type: none"> - Scale and setback of buildings - Managing trees - Open character through allotment sizes - Compatible with residential amenity 	These matters would be taken into account in further development of FDA11 area if zoned RLZ.
RLZ-P4	Commercial activities that maintain character and qualities of the RLZ and do not compromise residential amenity.	These matters would be taken into account in further development of FDA11 area if zoned RLZ.
RLZ-P9	Only allow other activities where: <ul style="list-style-type: none"> - Functional or operational need to locate in Zone - Compatible with character and qualities of the zone 	Developments other than residential development and commercial activities would need to take these matters into account if seeking to locate in FDA11 as RLZ.

	<ul style="list-style-type: none"> - Adequate infrastructure including on-site servicing where reticulated services are not available - Adequate water for firefighting purposes - Not compromise the efficiency and safety of the roading network 	There is no requirement to be connected to reticulated wastewater.
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The land in FDA11 can meet the objectives and policies of the RLZ so it would be appropriate that the land is rezoned RLZ.

Future Development Areas

Schedule 15 identifies five areas as future Rural Lifestyle Zone:

- FDA7 Thompsons Rd Temuka – Priority area 2 years
- FDA8 Manse Rd Pleasant Point – Priority area 5 years
- FDA9 Gleniti North Timaru – Priority area 5 years
- FDA10 Kellands Heights West Timaru – Priority area 5 years
- FDA11 Templer St Geraldine – Future Area - beyond 10 years.

The only area identified for Geraldine has a beyond 10 year timeframe.

FDA11 is currently an intensely developed area, with 38 lots, rather than a greenfields type of development. As such there are considerable constraints on development through a development plan as not all 38 current owners would benefit from future development. FDA11 is currently operating as a de facto rural lifestyle area given the nature of the development so it is inappropriate for inclusion as an FDA where development does not occur until the rezoning. Effectively the FDA places a 10 year plus hold on development of an area that has been occurring over the last 10 years or more. As such it is an inappropriate sequencing of development.

A review of the FDA7-10 indicate a much lesser current level of development.

6. Constraints on FDA11 remaining GRUZ for a further 10 years

The proposed District Plan anticipates that the FDA11 area will be zoned General Rural for at least ten years until a change to Rural Lifestyle zone through a Plan Change.

Given the current level of development within the FDA11 area there are considerable constraints on being able to use the land for primary production activities, particularly orcharding.

Issues have arisen with complaints regarding spray activity on the orchard and noise from bird scaring canons. Reverse sensitivity effects from new neighbours have rendered Peelview Orchard unsustainable and inoperable, with the areas of orchard planting being reduced away from

boundaries to internalise effects rendering it uneconomic. Neither is it economic to undertake other forms of primary production on the 8.7ha property (Refer Stuart Ford report Appendix 6).

The impact of reverse sensitivity and location of sensitive activities is recognised in the Proposed District Plan (GRUZ-O3) but in the case of Peelview it is not possible to mitigate the effects that are existing within the FDA11 area and so the objective provides no relief to the remaining primary production activities, such as the Payne's.

7. Growth and demand

The Preliminary s42A Report has requested information relating to the contribution of the rezoning or amendment of timing in relation to provision of sufficient development capacity.

In relation to a change in timing of FDA11 this requires extrapolation of data from a range of reports.

Reports or documents over a number of years that inform assessment of the growth and demand for rural lifestyle properties in the Timaru District include:

- Timaru District Growth Strategy 2017 Growth Assumptions Report, Ryder Consulting December 2015 (Growth Assumptions Report)
- Timaru District 2045 Draft Growth Management Strategy Consultation Summary and Officer Recommendations for Hearing Panel, Matt Bonis November 2017 (Bonis Report)
- Timaru Urban Growth Strategy Hearing Panel Decision Report 10 April 2018
- Timaru District 2045 Growth Management Strategy (GMS)
- Timaru District Residential Capacity Economic Assessment, Property Economics 2022 (PE 2022)
- Growth Management Strategy Review: Residential Planz Consultants April 2022 (PlanZ Report)
- Timaru District Residential Capacity Report Property Economics 2024 (PE 2024)

The 2017 Bonis report considered that calculating demand for rural residential development is difficult, in part due to the enablement approach in the Operative District Plan.

Limitations in the data include:

- Data for rural lifestyle is often generic across the district and not area specific
- What comprises rural lifestyle can vary
- The findings in the reports vary as a range of 'filters' or criteria have been applied.
- Rural lifestyle is sometimes included as part of residential capacity even though it is not part of an 'urban environment'

Such factors have contributed to a varying range of numbers for rural lifestyle demand and capacity.

*Timaru District Growth Strategy 2017 Growth Assumptions Report, Ryder Consulting
December 2015 (Growth Assumptions Report)*

The Growth Assumptions report provides market demand analysis due to limited available information. It identifies that 21 building consents between 2005-2015 were for Rural under 2 ha properties, equating to 13% of building consents issued. The report recommends that an average of 18 dwellings per year be provided over the next 30 years for rural residential development, being 540 rural residential dwellings across the district.

Specific analysis for Geraldine (Pg 85) showed a clear demand for rural residential intensification outside of the existing Rural 4A (Geraldine Downs) Zone, with a significant proportion of new lots located to the north of Geraldine's urban fringe, taking in a radius of 2km to Bennett Rd in the north.

A clear demand trend that has occurred to the north of Geraldine is the intensification of smaller rural allotments located within the northern end of the urban edge, with 24 new titles created in the last 10 years (2005-2015). (Pg 99)

Figure 3.13 shows the locations of new titles, with 35 new smaller lots created within a 2km radius of Geraldine (excluding Geraldine Downs) in the 10 year period 2005-2015, of which 24 clustered around Main North Rd, Bennett Rd and Templer St. This equates to an average of 3.5 lots created per year over the 10 year period.

The report recommends that 15% of rural residential capacity (81 dwellings over 30 years or 2.7 per year) in the district should be located in Geraldine and concludes that demand for rural residential development in Geraldine will primarily occur to the north of Geraldine (Pg 107).

The Growth Assumptions Report provides base data on trends that informed the GMS and district plan development.

Timaru District 2045 Draft Growth Management Strategy Consultation Summary and Officer Recommendations for Hearing Panel, Matt Bonis November 2017

Mr Bonis' report addressed submissions on the Growth Management Strategy (GMS) including rural residential density and demand. The DGMS provided for 465 dwellings at 5000m² or 233 at 1ha and considered that against a backdrop of urban consolidation additional rural residential zoning was inappropriate.

The report identified in Figure 11 that there was insufficient residential land to meet demand in Geraldine and proposed additional greenfield residential areas, but did not specifically address rural residential capacity, or the percentage of rural residential capacity proposed for the Geraldine area.

Timaru Urban Growth Strategy Hearing Panel Decision Report 10 April 2018

The Hearing Panel considered the submissions and consultation review recommendations and adopted them into the GMS. They noted that the *GMS is not a tablet of stone but provides strategic direction and should be considered a living document as informed, and necessarily amended, based on Monitoring Requirements in Section G.2 (Pg 15).*

Timaru District 2045 Growth Management Strategy (GMS)

The GMS F.5 addresses Geraldine. It states in regard to rural residential:

The Main Road East location is considered appropriate given that it is attached to the existing urban edge, can integrate with infrastructure (particularly via the Te Moana Water supply scheme) and recognises the existence of some pockets rural residential development particularly fronting Main North Road and Bennett Rd. There will need to be careful design of access to Main North Road (SH79).

Rural residential development in these locations will be implemented through the District Plan in the form of zoning changes and associated controls. Consolidation of rural residential development will be supported by subsequent changes to rural living provisions in the general rural zones.

Longer term and subject to considerable changes in demand a further rural residential opportunity could expand Main Road East through to Templer St.

The GMS identified an area east of Main North Rd East as rural residential and the area to Templer St as Rural Residential Deferred. (This land is now all identified as FDA11 in the PTDP).

Growth Management Strategy Review: Residential Planz Consultants April 2022

The GMS review revisited the GMS 2018 and residential growth forecasts as well as ground truthing the availability of developable residential land to inform the district plan development, particularly in relation to the NPS-UD. Rural lifestyle was specifically included as residential land.

The report at f) under Zone considerations (Pg 6) determines:

Rural residential development fulfils a small high-end portion of the housing market, i.e. it's expensive and only affordable to a small segment of property buyers and does not address housing choice or housing affordability. Swathes of rural residential development (or certainly the amount proposed) is not considered to give effect to the NPS-UD, as it would not result in a well-functioning urban environment.

The Report then considers Property Economic figures (January 2022) that estimated a growth demand for 1088 Rural Lifestyle and General Rural houses to 2040 with an average 57 lots per

year. (There is no differentiation between General Rural and Rural Lifestyle even though they are addressing different markets and requirements).

The report considers that a figure of 38 lots per year is more appropriate as that is the number of lots created in Rural 1 and 2 Zones over the last 11 years under the Operative Plan. It then details latent rural lifestyle supply, and recommends an average of 20 RL lots per year over 19 years. It also identifies Main North Road Geraldine plus the area to the east to Templer St, as DEV7 with 56 ha and a total yield of 74 HH with an average of 4 lots per year over 19 years.

The report recommends provision for 30 HH in the rural areas made up of:

Rural Zone	6 HH per year
Settlement and Maori Purpose Zones	4 HH per year
Rural Lifestyle	20 HH per year
TOTAL	30 HH per year

This figure of 30 HH is short of their proposed figure of 38 pa or the Property Economics figure of 57 pa.

The assumptions are based on the premise that the NPS-UD direction does not support an increase in rural residential development, although no specific evidence is provided to support this contention.

It also identifies Main North Road Geraldine plus the area to the east to Templer St, as DEV7 with 56 ha and a total yield of 74 HH with an average of 4 lots per year over 19 years.

At 9.5 (Pg 27) includes a map recommending that the area to Templer St should be included in DEV7 as RLZ as the area already contains a number of rural residential dwellings and is a logical addition to the RLZ.

Timaru District Residential Capacity Report Property Economics 2024 (PE 2024)

Rather than providing a figure for number of lots to be provided, the PE 2024 Report provides theoretical capacity based on provisions in the PTDP. Rural lifestyle is based on 5000sqm sized lots.

Table 3 identifies theoretical capacity for Settlement and RLZ of 404, with 123 lots being in Geraldine, but does not break down the location of the 123 lots within the Geraldine area.

This capacity is then tested to determine feasible capacity which determines that 12% is feasible, being a total of 41 Rural Settlement and RLZ (Table 5). Theoretical capacity was

tested for realisable capacity which determined that 11% of Settlement and RLZ is realisable, being a total of 44

If the 11% realisable figure is applied to the 123 theoretical RLZ in Geraldine it provides for 13.53 lots over 10 years or 1.3 lots per year. This is a significant reduction from the 3.5 lots created per year between 2005-2015 in a 2 km radius of Geraldine.

This realisable capacity is below the growth anticipated in the Growth Assumptions Report, GMS, the PE 2022 and the Planz report. Therefore to achieve the rural lifestyle growth in the GMS additional rural lifestyle could be provided through the PTDP, such as rezoning FDA11 to RLZ immediately.

Compilation of report recommendations for rural lifestyle in Timaru District

Report	RL per year	Period	Total
Growth assumptions	18	Over 30 years	540
GMS	18.6 at 5000m2 or 9.32 at 1ha	To 2045 (25 years)	465 dwellings at 5000m2 or 233 at 1ha
PE 22	57 (includes General Rural, Sttmt and Maori Purpose Zones)	Over 19 years	1088
Planz Report	20	Over 19 years	385
PE 2024	4.1	10 years of DP duration	41 Realisable capacity 404 Theoretical capacity

8. Potential capacity in FDA11

In the FDA11 area of 56 ha there are currently 38 lots with an average size of 1.47ha.

There are various projected densities that could result from FDA11 being rezoned RLZ:

- Property Economics (2024) Table 10 has a potential capacity of 96
- GMS Stage 1 and 2 combined Main Road East 78 dwellings (based on 46 ha, not 56 ha)

Both these projections are based on a 5000sqm minimum site size with a 15% allocation for roading.

An analysis of the 38 current lots sizes in FDA11 (Appendix 1 Table 1) shows:

- There are 20 lots that are less than 1ha so would have no subdivision possibilities if there is a minimum lot size of 5000sqm (unless a non-complying consent was sought as currently required with the PTDP rules).
- There are 18 lots over 1ha that could potentially subdivide if the minimum lot size is 5000sqm.
- Based on a hypothetical yield from the 18 lots 89 new lots of 5000sqm could be created, giving a total of 109 for the FDA11 area. However some existing lots of 1ha or over would be limited by current configuration of buildings and infrastructure, making two 5000sqm lots unrealisable. There is no adjustment of 15% for roading in the hypothetical yield.

- If an adjustment is made for roading there are 9 lots which would have potential difficulty creating two 5000sqm lots so 18 additional lots would be foregone, resulting in 71 new lots and a total of 91 for the FDA11 area.
- If the minimum lot size is 2ha then only 3 properties would be able to subdivide, creating an additional 9 lots (20 Bennett Rd, 99 Templer St and 53 Templer St), making a total of 47 lots within the FDA11 area
- If the minimum lot size is 1ha then seven properties could create 32 new lots, making a total of 63 lots within the FDA11 area.

Potential yield from FDA11 under different scenarios

Minimum lot size	No of lots able to subdivide	Potential Yield	Total lots in FDA11 (not adjusted for feasible capacity)	Realisable capacity based on PE24 criteria
5000sqm minimum lot	18	89	109	9.79
5000 sqm plus 15%	9	71	91	7.81
2ha	3	9	47	1
1ha	7	32	63	3.5

Therefore the potential capacity for the FDA11 area is contingent on the minimum lot size to be determined through the subdivision hearing. If the realisable capacity of 11% from the PE 2024 Report is applied this would significantly reduce the potential capacity.

The figures in Table 12 and 13 of the Property Economics Report (2024) are based on the 5000sqm assumption in Table 10 so any adjustment of minimum lot size would also require adjustment of the projection of 428 lots across Future Development Areas in Geraldine.

It should be noted that The Growth Assumptions Report (Pg 75) focussed on smaller lots because they are considered to be more efficient and effective in delivering urban consolidation outcomes promulgated within the CRPS. Larger lots will consume more rural productive land to achieve the desired outcome and are more likely to be further from existing settlements. Therefore the Growth Assumptions Report and the GMS are based on a minimum lot 5000sqm.

Attached as Appendix 7 are a number of letters from business owners in Geraldine who identify that there is a lack of housing in the area which has become an impediment to the growth and cohesiveness of the area. These letters demonstrate the need for the PTDP to better provide for sufficient land supply in the Geraldine area, of which rural lifestyle is part.

9. Is the application of an FDA necessary to manage release of land for rural lifestyle?

The PTDP seeks to control the provision of rural lifestyle land by applying FDA's across a range of timeframes. It is unclear why this is necessary given that provision of rural lifestyle

does not necessitate council investment in infrastructure – as compared to the urban environment.

By applying the FDA's the council is essentially 'picking winners' as to which land is developed rather than allowing the market to determine areas where rural lifestyle is sought. In the case of Geraldine, Geraldine Down has been included in the PTPD but not FDA11 even though the Growth Assumptions Report (Pg 99) observed Geraldine North as a preferred location over the specifically zoned Downs area.

Zoning sufficient land for the next twenty years enables the market to operate and provide for growth in the district. Delaying rezoning FDA11 will not assist in meeting sufficient capacity due to the delay for any Plan Change to be processed after the PTDP becomes operative.

Given the length of time of development and progress of the plan it is considered that there is no impediment to providing for rural lifestyle now, rather than seeking to control release.

FDA11 meets the criteria in the CRPS, is attached to Geraldine, and would provide for the shortfall in realisable capacity between the GMS and PE 2024 report so it is considered that FDA11 should be zoned RLZ in the PTDP, not deferred as an FDA.

The Growth Assumptions Report shows that the growth of rural residential in the areas north of Geraldine means that it has effectively been functioning as a de facto Rural Lifestyle Zone for at least the past 10 years. Rezoning FDA11 as RLZ would legitimise this development and enable consolidation into a clearly delineated RLZ, be an effective use of land and give effect to the CRPS. It would also provide a defensible boundary between Geraldine's urban environment and General Rural Zone north and east of FDA11. Provision of a land buffer assists in mitigating reverse sensitivity effects and avoiding locating sensitive activities encroaching onto primary production activities.

The Planz report identifies that FDA11 area already contains a number of rural residential dwellings and is a logical addition to the RLZ, but provides no reasons as to why it should be deferred.

10. Conclusion

The information presented for consideration for Hearing G- Growth relating to FDA11 supports rezoning of FDA11 immediately, rather than be deferred to 10 years plus.

The reasons that support this finding are:

- FDA11 meets objectives and policies for RLZ in PTDP
- FDA11 does not meet objectives and policies for GRUZ in PTDP so is inappropriate
- FDA11 is consistent with the Strategic directions in PTDP
- Providing for RLZ north of Geraldine is consistent with the Growth Management Strategy, albeit in slightly different timing

- An FDA11 Rural lifestyle development gives effect to the Canterbury RPS
- The analysis by Stuart Ford on NPS-HPL demonstrates that the NPS-HPL is not appropriate in respect to the Payne's property, which is the largest land area within FDA11
- The rezoning would reflect current land use, which is already effectively operating as a rural lifestyle area
- Rezoning as rural lifestyle is an efficient and effective use of land and provides capacity for demand for land and housing in the Geraldine area
- The rezoning would provide land for growth in Geraldine area in an area where the costs of building would be substantially less than in other suggested areas due to its flat topography.
- A rezoning as part of the PTDP would enable adverse effects of legacy issues from Operative Plan to be addressed and reduce reverse sensitivity effects in the district
- The GRUZ zoning and deferred FDA are not supported by S32 Report for PTDP
- Infrastructure requirements for rural lifestyle can adequately be provided for within the FDA11 area
- Development Areas plan or Structure Plans not appropriate for an area with 38 titles
- The realisable capacity for rural lifestyle in the PE 2024 Report does not appear to meet the demand for rural lifestyle in the GMS. FDA11 could increase the capacity, depending on the minimum lot size determined in the PTDP.

Appendix 1: Numbered Lots and Sizes

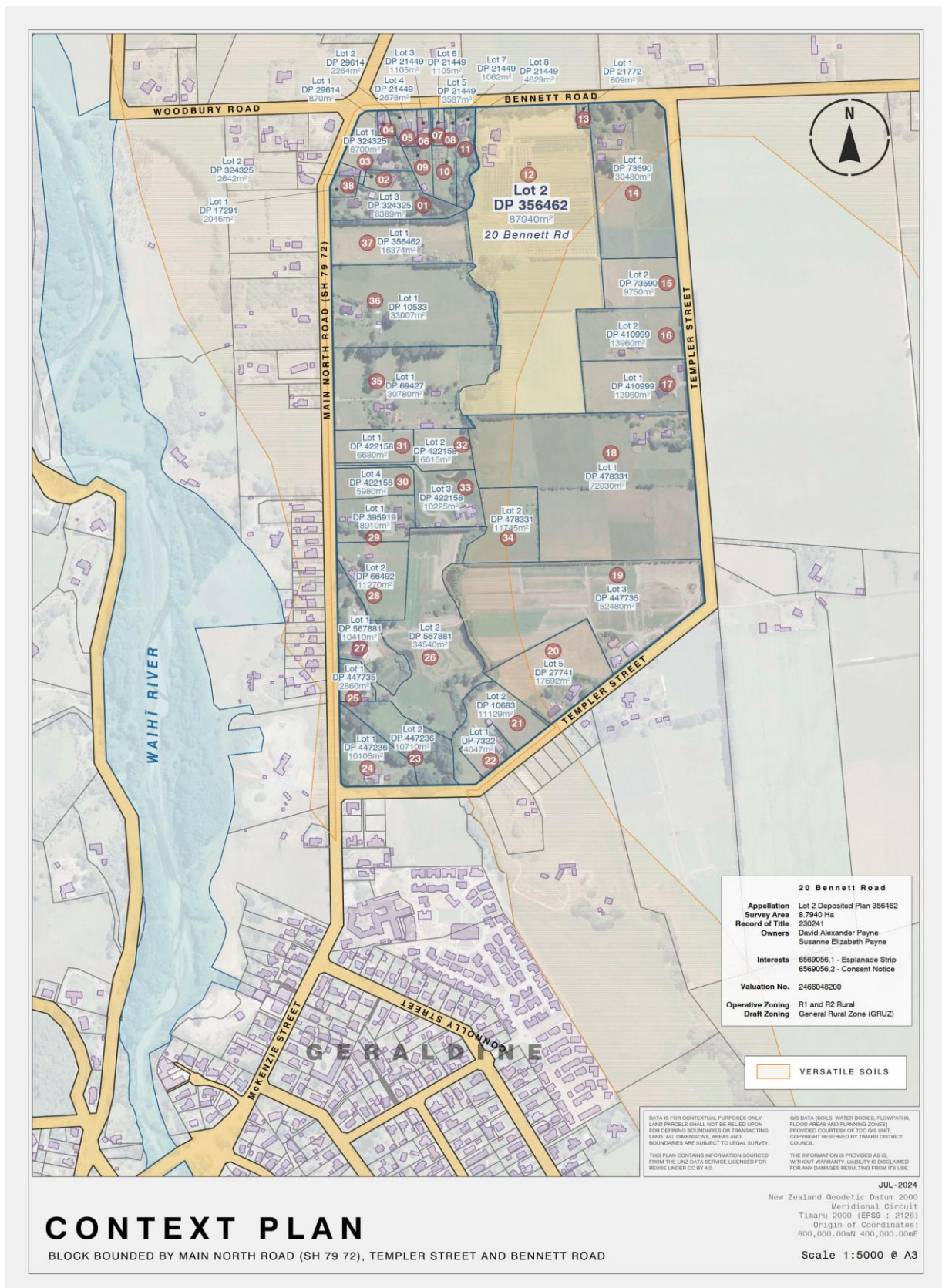


Figure 3: LINZ Context Plan with 38 lots identified across the precinct.

Table 1: Relevant property details as per Figure 6 (LINZ Context Plan)

Map Ref.	Street/Road #	Street / Road	Lot #	DP Reference	Size (sq/m)	Size (ha)
1	2a	Bennett Rd	Lot 3	DP 324325	8389	0.8389
2	2B	Bennett Rd	Lot 2	DP 324325	2642	0.2642
3	2	Bennett Rd	Lot 1	DP 324325	6700 (includes road splay)	0.6700
4	4	Bennett Rd	Lot 1	DP 29614	870	0.0870
5	6	Bennett Rd	Lot 2	DP 29614	2264	0.2264
6	10	Bennett Rd	Lot 3	DP 21449	1105	0.1105
7	12	Bennett Rd	Lot 6	DP 21449	1105	0.1105
8		Bennett Rd	Lot 7	DP 21449	1062	0.1062
9	18	Bennett Rd	Lot 4	DP 21449	2673	0.2673
10		Bennett Rd	lot 5	DP 21449	3587	0.3687
11		Bennett Rd	Lot 8	DP 21449	4629	0.4628
12	20	Bennett Rd	Lot 2	DP 356462	87940	8.7940
13	36	Bennett Rd	Lot 1	DP 21772	809	0.0809
14	40	Bennett Rd	Lot 1	DP 73590	30480	3.0480
15		Bennett Rd	Lot 2	DP 73590	9750	0.9750
16	111	Templer St	Lot 2	DP 410999	13960	1.3960
17	107	Templer St	Lot 1	DP 410999	13960	1.3960
18	99	Templer St	Lot 1	DP 478331	73030	7.3030
19	53	Templer St	Lot 3	DP 447735	52480	5.2480
20	45	Templer St	Lot 5	DP 27741	17692	1.7692
21	25	Templer St	Lot 2	DP 10683	11129	1.1129
22		Templer St	Lot 1	DP 7322	4047	0.4047
23	26	Main North Rd	Lot 2	DP 447236	10710	1.0710
24			Lot 1	DP 447236	10105	1.0105
25	42	Main North Rd	Lot 1	DP 447735	2860	0.2860
26	54	Main North Rd	Lot 2	DP 567881	34540	3.4540
27	56	Main North Rd	Lot 1	DP 567881	10410	1.0410
28	64	Main North Rd	Lot 2	DP 66492	11270	1.1270
29	70	Main North Rd	Lot 1	DP 395919	8910	0.8910
30	80	Main North Rd	Lot 4	DP 422158	5980	0.5980
31		Main North Rd	Lot 1	DP 422158	6680	0.6680
32		Main North Rd	Lot 2	DP 422158	6615	0.6615
33		Main North Rd	Lot 3	DP 422158	10225	1.0225
34		Main North Rd	Lot 2	DP 478331	11745	1.1745
35	90	Main North Rd	Lot 1	DP 69427	30780	3.0780
36	102	Main North Rd	Lot 1	DP 10533	33007	3.3007
37	112	Main North Rd	Lot 1	DP 356462	16374	1.6374
38	126	Main North Rd	Lot 1	DP172991	2046	0.2046
Total sq/m					561340 sq/m	56.134 h/a

Appendix 2: Ongoing Riparian Plantings at Peelview Orchard 20 Bennett Rd Geraldine



Figures A, B, C & D: Establishing esplanade planting of eco-sourced native species along Raukapuka Stream through the centre of property.



Figures E, F, G, & H: Recent (Spring 2024) esplanade plantings of eco-sourced native species along Raukapuka Stream following the removal of large Willows in June 2024.*

**At all locations where the Paynes have access to Raukapuka Stream's margin, they have worked to establish an esplanade of native vegetation to improve biodiversity, birdlife and the spring-fed stream's water quality. These plantings will continue to enhance the stream's amenity over time.*

Appendix 3: Geraldine Protected Community Water Zone

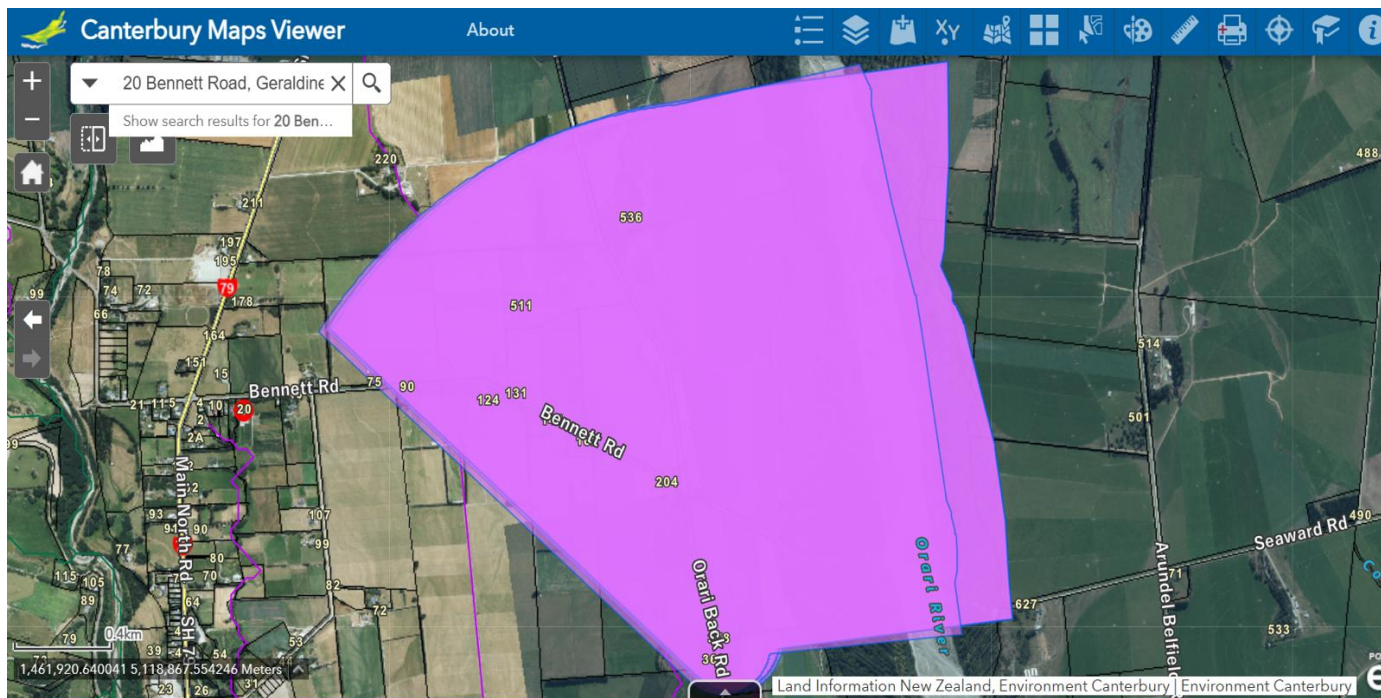
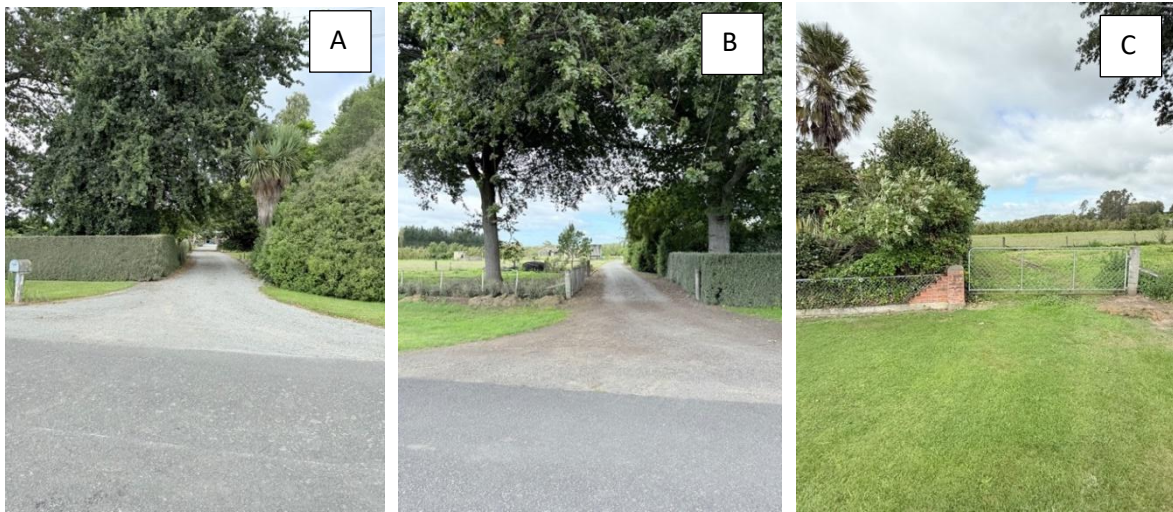


Figure 4: Geraldine Protected Community Water Zone (Source: Canterbury Maps).

Appendix 4: Accessways to Peelview Orchard from Bennett Road



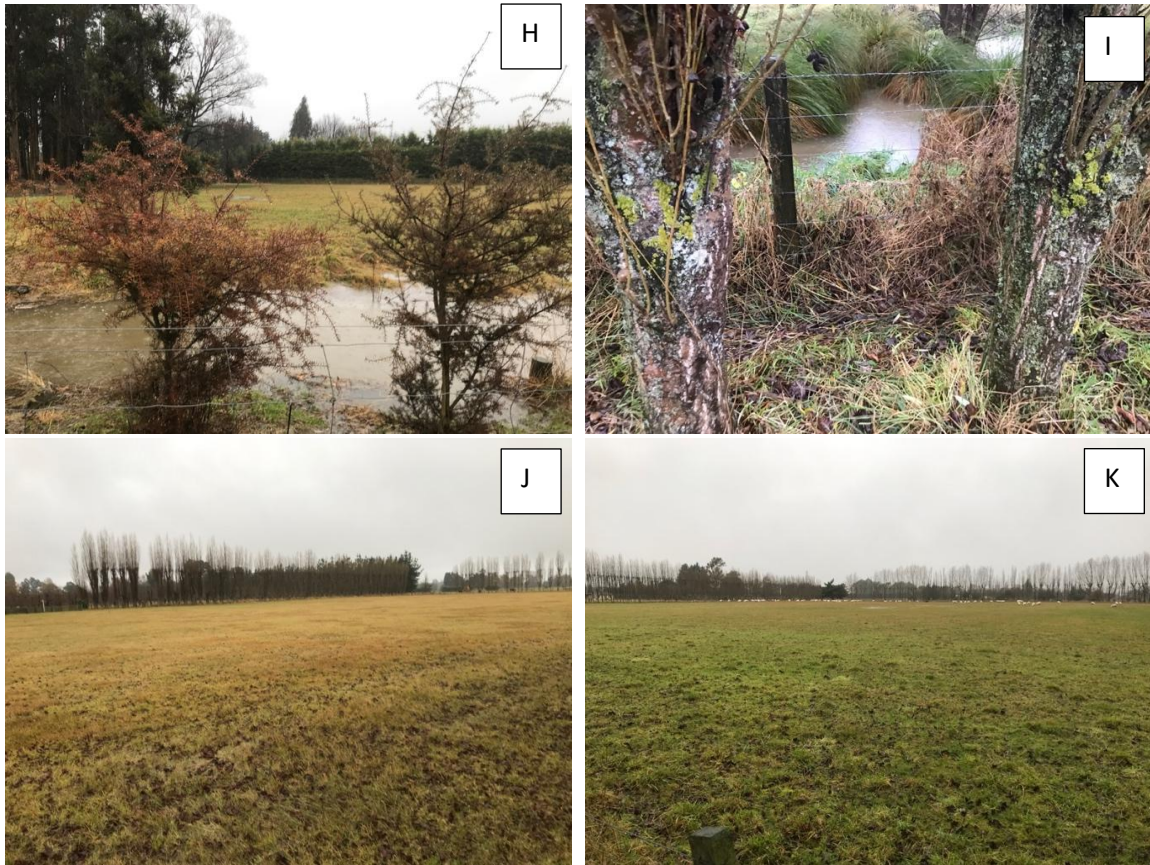
Figures A, B and C: Existing Access Ways (Figure A existing access to residence, Figure B existing access to orchard and sheds, Figure C existing access at eastern property boundary).



Figures D & E: Suggested central access way location (as per concept plan of development within suggested 2ha minimum size limits).

Appendix 5a: Photos of Peelview Orchard During 2021 Flood Event





Figures A, B, C, D, E, F, G, H, I, J & K: Photos taken 30 May 2021 at peak of major flood event that severely impacted Mid and South Canterbury (1 in 200 year AEP event). There was extensive flood damage across South Canterbury. However, as shown by the photos, Raukapuka Stream swelled but there was no impact to the surrounding property.

Appendix 5b: Photos of Peelview Orchard during 2023 Flood Event



Figures A, B, C, D: Taken on 24 July 2023 during a significant rain event. Raukapuka Stream swelled but there was no impact on the property.

Appendix 6: NPS-HPL Assessment by Stuart Ford, The AgriBusiness Group

Refer attached PDF file

Appendix 7: Letters from Geraldine businesses regarding land and housing supply

Refer attached PDF Zip file